

ORIGINAL TRANSCRIPT

Page 1

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA,  
ET AL, JEFFREY M. SIMONEAUX,  
RELATOR

NO. 3:12CV219

VERSUS

E.I. DuPONT DE NEMOURS AND  
COMPANY

\* \* \* \* \*

TRANSCRIPT OF THE DEPOSITION OF  
T.J. OZBUN

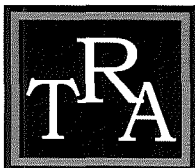
TAKEN ON BEHALF OF PLAINTIFF, REPORTED IN THE  
ABOVE ENTITLED AND NUMBERED CAUSE BY SELINA P.  
ROUSSEL, CERTIFIED COURT REPORTER FOR THE STATE OF  
LOUISIANA.

\* \* \* \* \*

REPORTED AT THE OFFICES OF:

KUCHLER, POLK, SCHELL, WEINER & RICHESON, LLC  
1615 POYDRAS STREET, SUITE 1300  
NEW ORLEANS, LOUISIANA 70012

COMMENCING AT 9:58 A.M., ON NOVEMBER 26, 2013



**TORRES REPORTING & ASSOCIATES, INC.**

**COURT REPORTING & LITIGATION SERVICES**

**[www.torresreporting.com](http://www.torresreporting.com)**

**1.866.982.6878 Toll Free**

**Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX**

**New Orleans, LA  
504.392.4791  
504.392.4852 FAX**

APPEARANCES

FOR THE PLAINTIFF:

J.H. BARNEY LAW FIRM, LLC  
 (BY: JANE H. BARNEY, ESQ.)  
 2561 CITIPLACE CT, SUITE 750-161  
 BATON ROUGE, LOUISIANA 70808

FOR THE DEFENDANT:

KUCHLER, POLK, SCHELL, WEINER & RICHESON, LLC  
 (BY: MONIQUE M. WEINER, ESQ.)  
 1615 POYDRAS STREET, SUITE 1300  
 NEW ORLEANS, LOUISIANA 70112

ALSO PRESENT:

JEFFREY SIMONEAUX

I N D E X

PAGE

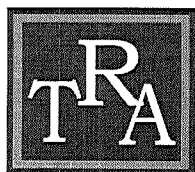
EXAMINATION BY:

MS. BARNEY.....	5
MS. WEINER.....	295

RE-EXAMINATION BY:

MS. BARNEY.....	298
-----------------	-----

CERTIFICATE.....	305
------------------	-----



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

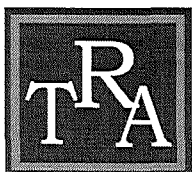
Baton Rouge, LA  
 225.751.0732  
 225.752.7308 FAX

New Orleans, LA  
 504.392.4791  
 504.392.4852 FAX

1.866.982.6878 TOLL FREE

## LIST OF EXHIBITS

1		
2		
3	NO. 1.....	16
4	NO. 2.....	78
5	NO. 3.....	141
6	NO. 4.....	180
7	NO. 5.....	187
8	NO. 6.....	187
9	NO. 7.....	204
10	NO. 8.....	209
11	NO. 9.....	230
12	NO. 10.....	233
13	NO. 11.....	240
14	NO. 12.....	245
15	NO. 13.....	247
16	NO. 14.....	248
17		
18		
19		
20		
21		
22		
23		
24		
25		

**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING &amp; LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

## S T I P U L A T I O N

It is stipulated and agreed by and among  
counsel for the parties hereto that the deposition  
of the aforementioned witness is hereby being  
taken under the Louisiana Code of Civil Procedure,  
for all purposes, in accordance with law;

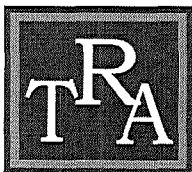
That the formalities of reading and signing  
are specifically waived;

That the formalities of sealing,  
certification, and filing are specifically waived;

That all objections, save those as to the  
form of the question and the responsiveness of the  
answer, are hereby reserved until such time as  
this deposition, or any part thereof, may be used  
or sought to be used in evidence.

SELINA P. ROUSSEL, Certified Court  
Reporter, in and for the State of Louisiana,  
officiated in administering the oath to the  
witness.

\* \* \* \* \*



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

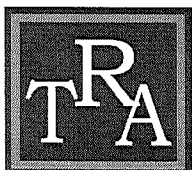
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

T.J. OZBUN,  
after having been first duly sworn by the  
above-mentioned Certified Court Reporter was  
examined and testified as follows:  
EXAMINATION BY MS. BARNEY:  
Q. Good morning, Mr. Ozbun.  
A. Good morning.  
Q. Could you state your full name and  
address for the record, please.  
A. Yes. My name is T.J. Ozbun, III. 13628  
Airline Highway, Gonzales, Louisiana.  
Q. And how long have you lived at that  
address?  
A. Since 2004.  
Q. All right. And where did you live before  
that?  
A. 44499 Highway 42, Prairieville,  
Louisiana.  
Q. Are you currently employed?  
A. Yes.  
Q. And where are you employed?  
A. I'm at DuPont Burnside plant.  
Q. How long have you been employed there?  
A. It will be 35 years in June. So  
34-and-a-half.



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. That is a long time.

2 A. Yes. Too long.

3 Q. Are you eligible for retirement anytime  
4 soon?

5 A. Yes.

6 Q. When would that be?

7 A. When I was 58.

8 Q. Okay. So you are already eligible?

9 A. I'm eligible. Yes.

10 Q. And what year were you eligible?

11 A. What year was that? 2010.

12 Q. Okay. Any particular reason you decided  
13 to stay on?

14 A. Yeah. Yes. I enjoyed my income and  
15 insurance benefits and those type of things.

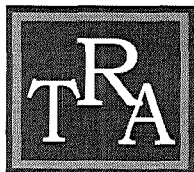
16 Q. Okay.

17 A. Actually, it was 2009 since we are  
18 telling the truth. I have to calculate. I don't  
19 know. '09 or '10, I don't know. Somewhere around  
20 there.

21 Q. And what position were you in in 2009?

22 A. 2009, I was the safety and health person,  
23 distribution person, security person. I guess  
24 that is close enough.

25 Q. Okay. Have you ever given a deposition



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 before?

2 A. Years ago. Back in -- a long time ago.  
3 15 years maybe.

4 Q. Okay. And why -- only one time?

5 A. I think so, yes.

6 Q. And why did you have to give a  
7 deposition? Do you recall?

8 A. It was either some asbestos litigation or  
9 it was a painter, dealing with some kind of sand  
10 substance he was sandblasting with. It is one of  
11 those two, if I remember correctly.

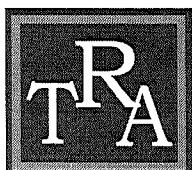
12 Q. Okay. Any other times that you have had  
13 to give a deposition that --

14 A. They've asked me questions before, but I  
15 think that was the only deposition I really sat  
16 down and did.

17 Q. All right. So you generally understand  
18 how a deposition works?

19 A. Generally.

20 Q. Okay. One thing we can watch for, and  
21 I'm bad about this, so maybe you can help me,  
22 we'll work together on it, is letting one person  
23 finish the question or the answer before the other  
24 one starts talking. It starts getting  
25 conversational and you forget to do that, so it



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 would help the court reporter if we can try not to  
2 talk over each other.

3 Another thing is if you can say  
4 "yes" or "no" in response to answers, instead of  
5 uh-huh or nodding your head, that sort of thing.  
6 It helps the court reporter.

7 And if you have any questions -- if  
8 you have any concerns or you need a break, then  
9 you can let me know and we can stop and take a  
10 break. I think it is best if there is not a  
11 question on the table, if you can go ahead and  
12 answer the question, and then we can take a break  
13 if you need one.

14 Are you on any medication today  
15 that would make it hard for you to understand  
16 questions or give accurate answers?

17 A. No.

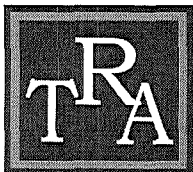
18 Q. Okay. What medicine do you take on a  
19 regular basis?

20 A. I take Crestor. I take Micardis,  
21 Allopurinol. That is it.

22 Q. You are not on any pain medicine or  
23 anything?

24 A. (Shakes head negatively.)

25 No. I shook my head.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Habit.

2 Can you tell me what you did to  
3 prepare for your deposition today?

4 A. I came over here Friday at the request of  
5 Monique and we sat down for two or three hours and  
6 discussed it.

7 Q. Okay. Anything else? Did you talk with  
8 anybody else about the fact that you were coming  
9 here today?

10 A. They were aware of it, the people at  
11 work.

12 Q. Who are those people?

13 A. Just about everybody there. The ones I  
14 had conversations with, they sort of knew where I  
15 was headed.

16 Q. Okay. There is a lot of people at the  
17 plant, I would think, so you probably didn't talk  
18 to every one of them?

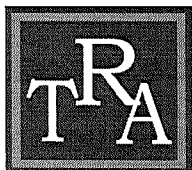
19 A. Probably. I guarantee most of them know,  
20 though.

21 Q. Just the rumor mill?

22 A. Probably.

23 Q. Which ones did you actually have a  
24 discussion with?

25 A. I had a discussion -- I think I told Todd



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Yenni, Ronnie Burns, George Valentine, Elizabeth  
2 Cromwell, Vernon Patterson, Wade Miller. Let's  
3 see. Daniel Boudreaux, Tammy Harris, Meta Smith,  
4 Tom Miller. I guess that is probably it.

5 Q. Okay. Todd, what is Todd's last name?

6 A. Yenni.

7 Q. Yenni?

8 A. Y-E-N-N-I.

9 Q. And what did you talk to Todd about?

10 A. I just said I was coming over here.

11 Q. Okay. And what about Ronnie Burns?

12 A. I just said I was coming over here.

13 Q. Did you talk about any of the issues --

14 A. No.

15 Q. -- with Mr. Burns or Mr. Yenni?

16 A. No.

17 Q. What about Mr. Valentine?

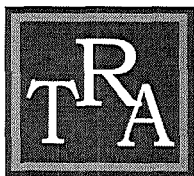
18 A. No. No discussion. Just the fact that I  
19 was coming here.

20 Q. Did you talk about which case or what  
21 case you were coming --

22 A. No.

23 Q. Okay. And Ms. Cromwell?

24 A. Just discussed the fact that I was coming  
25 here.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. What about Mr. Patterson?

2 A. I think they were in the same  
3 conversation with Todd. We were in the same room.

4 Q. Okay. And what about Wade Miller; what  
5 did you talk to him about?

6 A. We were in the same room. It was like  
7 coffee in the morning, breakfast thing.

8 Q. Okay. And that was this morning?

9 A. No. That would have been last Wednesday  
10 or Thursday.

11 Q. Okay.

12 A. We discussed that I was coming here  
13 Friday.

14 Q. Okay. And was Daniel Boudreaux in the  
15 same room?

16 A. I don't remember. I think Daniel was at  
17 his desk maybe.

18 Q. What did you to talk to Mr. Boudreaux  
19 about?

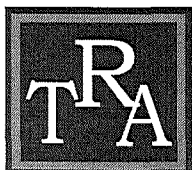
20 A. Coming over here.

21 Q. And what's -- Harris, what was the first  
22 name?

23 A. Tammy.

24 Q. Where did you talk with her?

25 A. I think it was in her office.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And what is her position?

2 A. She is the KBR safety person there.

3 Q. Okay.

4 A. She just recently came onboard in the  
5 last couple of months.

6 Q. She took over from Ian Devlin?

7 A. Yes.

8 Q. Did he pass away?

9 A. Killed in a motorcycle accident.

10 Q. And Meta Smith, she is with DuPont?

11 A. Yes.

12 Q. And what did you talk to her about?

13 A. That I was coming over here.

14 Q. Tom Miller?

15 A. He knew. He is sort of my boss so he  
16 knew.

17 Q. How long did you talk with Mr. Miller?

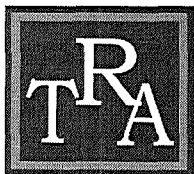
18 A. Not long at all. Just said I was coming  
19 over here.

20 Q. Were you in his office?

21 A. May have been. I don't know. Probably  
22 not. I don't know. He may have come to my  
23 office.

24 Q. Okay. When was that?

25 A. Actually, the last time I had a



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 conversation was more like a text. And I told him  
2 I was here like three hours Friday and he texted  
3 back to me and he said he was here longer than  
4 that. And then he texted me about some other  
5 things about the job, just -- because he is on  
6 vacation this week, so there were some things he  
7 was concerned about, and that was it.

8 Q. Did he mention that his deposition is  
9 coming up, too?

10 A. I know his deposition is coming up, but I  
11 couldn't tell you what time it is. It is my  
12 understanding it was.

13 Q. All right. So other than talking to the  
14 people on this list and Ms. Weiner, did you do  
15 anything else to get ready for your deposition?

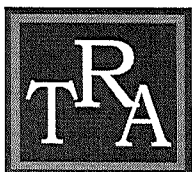
16 A. Other than provide her with some  
17 information that she requested yesterday. And --  
18 she sent me an e-mail Friday evening and then I  
19 got the information together yesterday.

20 Q. Okay.

21 A. And that was it.

22 Q. Okay. Did you review any documents, any  
23 paperwork, or anything leading up to your  
24 deposition?

25 A. No.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. What kind of information did you gather  
2 for Ms. Weiner?

3 A. I gathered for her?

4 MS. WEINER:

5 What we can do to make it easier,  
6 for the record, I've got DSF1013 through 1018 that  
7 I'll produce a copy of to you, so that was it.

8 MS. BARNEY:

9 Great.

10 MS. WEINER:

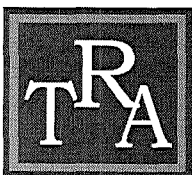
11 And to clarify, I believe in answer  
12 to your question if he looked at any documents,  
13 you can ask him. I don't think he looked at any  
14 documents on his own. He did review some  
15 documents with me and I have those segregated for  
16 you, too. I'll hand you that group. They are  
17 here. Not necessarily sequentially Bates  
18 numbered, but that is the group.

19 MS. BARNEY:

20 All right.

21 Yeah, sometimes it is hard to know  
22 when you are in a meeting with a lawyer, is that  
23 off or on limits. So I understand.

24 So the documents that he reviewed  
25 in your office --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 MS. WEINER:

2 Right here.

3 MS. BARNEY:

4 -- are right here?

5 While we're exchanging things, I  
6 wanted to go ahead and give you, this is an audio  
7 from the 9/27/13 site inspection --

8 MS. WEINER:

9 Okay.

10 MS. BARNEY:

11 -- that I think I told you it was  
12 on its way to you.

13 MS. WEINER:

14 Okay.

15 MS. BARNEY:

16 And we may get to this in more  
17 detail when I go into some documents, but I wanted  
18 to show you this e-mail. These are some safety  
19 manual excerpts from DuPont. And maybe you can --

20 MS. WEINER:

21 Show it to him?

22 MS. BARNEY:

23 Yeah, that would be great.

24 BY MS. BARNEY:

25 Q. Mr. Ozbun, if you can look at that list



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 for me, that is a list of manual --

2 A. Yes, they are.

3 Q. -- sections maybe; is that the way to  
4 describe those?

5 A. Yes.

6 (Whereupon, the document referred to is  
7 marked as Exhibit No. 1 for identification.)

8 BY MS. BARNEY:

9 Q. And this is an e-mail from me to Monique  
10 Weiner that we can just label Exhibit 1, I guess,  
11 since we are talking about it.

12 Would those be difficult to put  
13 your hands on at DuPont?

14 A. No.

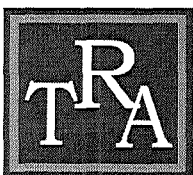
15 Q. Okay. Do you happen to have those with  
16 you today?

17 A. No.

18 Q. I just sent an e-mail to Monique  
19 Saturday, just seeing if you can bring those  
20 today, but she has been in Baton Rouge yesterday  
21 and we just haven't physically gotten them here.  
22 But --

23 MS. WEINER:

24 And I haven't physically had time  
25 to even coordinate that production. Obviously, we



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 want to get them, review them for relevance before  
2 we did that. So i will tell you that we are  
3 working on it, but I need some time other than one  
4 business day to be able to produce those since we  
5 had Jeff's deposition all day yesterday.

6 MS. BARNEY:

7 Yeah. I understand.

8 BY MS. BARNEY:

9 Q. But those are basically documents that  
10 you are kind of familiar with; they don't look  
11 foreign to you?

12 A. No, they don't look foreign.

13 Q. So in some reasonable amount of time, we  
14 can probably find those at Dupont?

15 A. Yes.

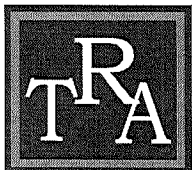
16 Q. Would those be documents that you are in  
17 charge of keeping track of?

18 A. No. These are on the -- these documents  
19 are accessible on the intranet. Every DuPont site  
20 in the world probably can get these documents.

21 Q. Okay. What about that list of documents  
22 tells you that those are things on the Dupont  
23 intranet?

24 A. Just the numbers.

25 Q. Okay.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. And, of course, there is a couple of them  
2 that actually say DuPont. That is a good hint.  
3 The rest of them, I just recognize the names of  
4 them. That is typical of new DuPont. I think  
5 that is what they called their standards.

6           Q. All right. When you say "standards,"  
7 what does that mean?

8           A. That is what they call them. They have  
9 engineering standards; they have health standards.  
10 It is just the terminology that we have grown  
11 accustomed to using.

12          Q. Are those prepared at the corporate level  
13 at Dupont?

14          A. Yes.

15          Q. So if somebody at Burnside wanted to  
16 modify those standards, they just couldn't do that  
17 and say "This is going to be the new standards"?

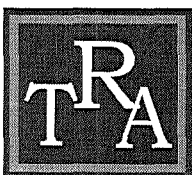
18          A. No. There is a process.

19          Q. Okay. Do you know whether or not those  
20 documents contain a revision date, the date they  
21 were last reviewed or revised?

22          A. I'm sure they do. There is document  
23 control. I'm sure there is some revision dates.

24               MS. BARNEY:

25               Okay. I guess, if he we could,



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Monique, if we can just get whichever ones on that  
2 list, go back to maybe December 2011, the ones  
3 that are -- in case they changed over the last  
4 couple of years.

5 MS. WEINER:

6 I'll check into it.

7 And for the record, I think you've  
8 already got a copy of the first one, the DuPont  
9 SHE protocol S1Z. We previously produced that  
10 one. So you have that one.

11 MS. BARNEY:

12 In this case?

13 MS. WEINER:

14 Yes.

15 MS. BARNEY:

16 So it is here in these binders?

17 MS. WEINER:

18 Yes.

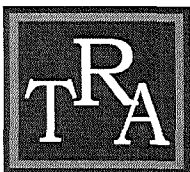
19 BY MS. BARNEY:

20 Q. All right. Let's go back to you.

21 A. Sure.

22 Q. Can you give me, I guess, your  
23 background: Where you are from? Are you from  
24 Baton Rouge or Louisiana originally?

25 A. I moved back to Louisiana in '75.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Where did you live before that?

2 A. I lived in Texas. Pittsburgh, Texas.

3 Q. Okay.

4 A. I had lived in Louisiana previously when  
5 I was a child and came back as soon as I could.

6 Q. Okay. Where did you go to high school?

7 A. Two schools: Plainview High School in  
8 Plainview, Texas; Hale Center High School in Hale  
9 Center, Texas. That's H-A-L-E.

10 Q. Okay. And what year did you graduate  
11 high school?

12 A. 1969.

13 Q. All right. And did you go to school  
14 after high school?

15 A. Yes.

16 Q. Where did you go?

17 A. Howard Payne University.

18 Q. I'm sorry?

19 A. Howard Payne University.

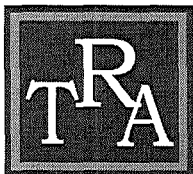
20 Q. And where is that?

21 A. Brownwood, Texas.

22 Q. What did you major in at Howard Payne?

23 A. English and physical education.

24 Q. Okay. Were you thinking about being a  
25 teacher?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. Coach and teacher, yes. Was thinking  
2 about it.

3 Q. Did you end up doing that?

4 A. No.

5 Q. How long were you at Howard Payne?

6 A. I graduated. I finished in the summer of  
7 '73.

8 Q. And what degree did you have?

9 A. A B.S. degree.

10 Q. And what was the degree in?

11 A. English and P.E.

12 Q. So you got a dual --

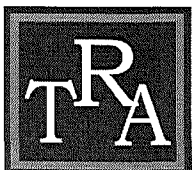
13 A. Yes. Basically. It was a Bachelor of  
14 Science -- was a pretty standard fare. I think it  
15 was -- major was physical education, minor was  
16 English.

17 Q. So if you looked at your certificate, it  
18 just says Bachelor of Science?

19 A. Yes, that's it.

20 Q. So what made you decide not to be a  
21 teacher and a coach?

22 A. I didn't -- most of it had to do with the  
23 pay. It wasn't that great. And I really was  
24 tired of football. I really didn't want to see  
25 another football. I had been doing that for such



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 a long time and never went that direction.

2 Q. So you played football at some point, I  
3 take it?

4 A. Yeah. At the college there.

5 Q. So you played football at Howard Payne?

6 A. Yes.

7 Q. What position?

8 A. I was a tailback.

9 Q. And you played all four years?

10 A. No, I did not. I played three years and  
11 was injured and didn't finish out.

12 Q. How were you hurt?

13 A. Knees.

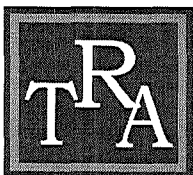
14 Q. Okay. So what did you do between 1973  
15 and '75 when you moved back to Louisiana?

16 A. Let's see, I started working for a  
17 company called Pilgrims Industries, chicken. They  
18 sold chickens. Worked for them for probably a  
19 year, maybe, and then I went to work for the Texas  
20 Department of Public Welfare.

21 Q. And what was your job for the Texas  
22 Department of Public Welfare?

23 A. Office food stamp caseworker.

24 Q. And how long were you at each of those  
25 jobs?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I stayed about a year at each one of  
2 them.

3 Q. Okay. And then what prompted you to move  
4 back to Louisiana?

5 A. My parents had moved to Baton Rouge  
6 probably in '74 maybe and they had talked to a  
7 gentleman here that said he would offer me a job  
8 and it looked like more money, so I moved to  
9 Louisiana. I moved to Baton Rouge first.

10 Q. Who did they talk to in Baton Rouge?

11 A. The gentleman's name was William M.  
12 Bailey. Insurance guy. It was an insurance job.

13 Q. Did you actually go to work for  
14 Mr. Bailey?

15 A. Yes, I did.

16 Q. So you sold insurance?

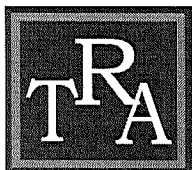
17 A. Yes, I did and --

18 Q. And for how long did you do that?

19 A. Until about '77. Somewhere around there.

20 Q. All right. And then what prompted you to  
21 leave that job?

22 A. They prompt -- they shut the office down  
23 in Baton Rouge, the company that I was working for  
24 did, and they formed us out to another company.  
25 If I had to tell you the name of the company right



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

**225.751.0732**

**225.752.7308 FAX**

**New Orleans, LA**

**504.392.4791**

**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 now, I couldn't, because I didn't work for them  
2 that long. And the agency that I remember was  
3 with the new company that was down here in New  
4 Orleans. Friedler Lyons Agency, I think was the  
5 name of these guys. I stayed with them about two  
6 or three months and moved on, and that was it.

7 Q. Okay. So what did you do next?

8 A. Looked for jobs for a month or two, and  
9 then went to work for a fireplace business in  
10 Baton Rouge. I was the manager of, I guess, their  
11 storefront, their retail business.

12 Q. You remember the name of that?

13 A. The Fireplace Shop.

14 Q. Was that on Perkins Road?

15 A. It was on Florida Boulevard. 11712  
16 Florida Boulevard. I remember that.

17 Q. So you left the insurance job  
18 voluntarily?

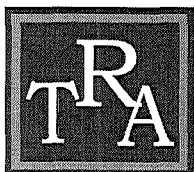
19 A. Yes.

20 Q. And looked for something else?

21 A. Yes.

22 Q. How long were you at the fireplace  
23 business?

24 A. From probably the end of '77 till '79,  
25 April of '79.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Why did you leave that job?

2 A. It was not going well. It wasn't a very  
3 good job, so I moved on. I started looking for  
4 other jobs and making applications, those type of  
5 things, which you do when you are 26 or 27 years  
6 old. You keep looking.

7 Q. Were you asked to leave The Fireplace  
8 Shop, or did you voluntarily leave?

9 A. I was not asked to leave. I volunteered.

10 Q. Have you ever been asked to leave a job?

11 A. No.

12 Q. That shortcuts all my questions.

13 A. Sure.

14 Q. So after the fireplace job, where did you  
15 go to work?

16 A. Within about two months, I was hired by  
17 Dupont. I think I left in April. June 13th is my  
18 anniversary date with DuPont.

19 Q. All right. So June 13th of 1979?

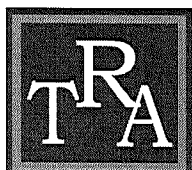
20 A. Yes.

21 Q. How did you hear about the Dupont job?

22 A. It was in the newspaper.

23 Q. Do you remember what they were  
24 advertising for?

25 A. Operator. And we didn't go through any



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 kind of agency back then. I filled out an  
2 application. I mailed it in or something like  
3 that, and I got called in at some point, probably  
4 in the middle of May, around there, for an  
5 interview.

6 Q. All right.

7 A. Just visited the plant.

8 Q. Do you remember who interviewed you?

9 A. I think the plant manager, Harold Rosco,  
10 was one of the people that interviewed me. And  
11 then there was a gentleman from Kentucky in the  
12 H.R. group that was actually doing most of the  
13 hiring process. I don't remember his name.

14 Q. Okay. So you got that job and started  
15 June 13th?

16 A. Yes.

17 Q. Did you -- back then, did they have any  
18 training?

19 A. To get the job or what?

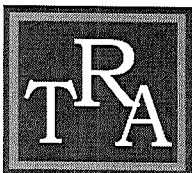
20 Q. To get the job.

21 A. When I -- after I got the job, training?

22 Q. You can answer it both ways. Before you  
23 got the job, there was no training or anything?

24 A. No.

25 Q. And after you got the job --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Yes.

2 Q. -- they had some on-the-job training?

3 A. Yes.

4 Q. How long were you in the training role at  
5 DuPont?

6 A. I think officially, back then, they  
7 called it one year.

8 Q. Okay.

9 A. I think the progression was two.

10 Q. Do you recall who helped in your  
11 training?

12 A. It was peer training, so it would have  
13 been all the operators there, some of the  
14 maintenance guys, the supervisors, all had a role  
15 in it.

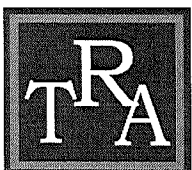
16 Q. Who were the operators who had a role in  
17 your training?

18 A. Ronald Jones, Ralph Bergeron, Lynell  
19 Lambert, Percy Bell, Harry St. Pierre, Gene  
20 Pitman, Clyde Savoy.

21 How many is that?

22 Q. Seven.

23 A. Seven. Let me think of some more names.  
24 Mechanics would have been Teny LeBlanc. Actually,  
25 his name is Jules LeBlanc. Another operator,



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Cleveland Melancon; maintenance guy, Harris  
2 Bourque; maintenance guy, Beau Porrier, Pat  
3 Falterman, L.J. Mayers, M-A-Y-E-R-S, Lloyd  
4 Edwards, Dave Joshua, that's probably it.

5 There may have been another one off  
6 the top of my head. I haven't seen those guys in  
7 a while. There were --

8 Q. That is a good list.

9 A. Peer training. Everybody helped.

10 Q. Who were the supervisors; do you know?

11 A. My first supervisor was -- he stayed  
12 there about one month and left. I don't know. I  
13 can't seem -- it was Howard Wilcox that did most  
14 of the training with me. He came on about a month  
15 after I had been there.

16 Q. And who was the plant manager then?

17 A. Harold Rosco.

18 Q. So you were hired on as an operator?

19 A. Yes.

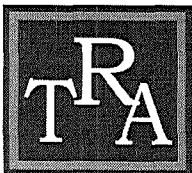
20 Q. Trained as an operator?

21 A. Yes.

22 Q. How long did you stay an operator at  
23 Dupont?

24 A. Until 1996.

25 Q. So that 20 --





1 A. That is like 17 years.

2 Q. Did your job change any during the  
3 17 years that you were an operator?

4 A. Technology changed, so there was  
5 improvement in technology, those type of things.  
6 We were a manual world back then and it was  
7 becoming automated. That is some of the process  
8 that was taking place. They increased some of the  
9 production at the site. We were able to produce  
10 more. Basically the task of being an operator,  
11 the responsibilities didn't change; it was pretty  
12 well the same thing we had always done. We did  
13 change -- we didn't load railcars after a while.  
14 At least, I didn't. And we had a gentleman -- Joe  
15 Ory -- that's another name. Joe took the railcar  
16 loading position which alleviated us from those  
17 responsibilities most of the time.

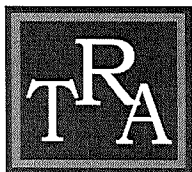
18 Q. Is that O-R-Y?

19 A. O-R-Y.

20 Q. About what year would you say Joe took  
21 over that responsibility?

22 A. I don't know. '94, maybe. Somewhere  
23 around there. I'm guessing. '94-'95.

24 Q. Up until '94 and '95, would you say you  
25 loaded railcars?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Yes. Railcars, barges, what everybody  
2 else did out there.

3 Q. So at some point, you started working  
4 with Jeff Simoneaux?

5 A. Yes.

6 Q. Do you remember what year?

7 A. 1990.

8 Q. Okay. And he was an operator with you?

9 A. Well, he was hired on, Jeff and Cathy  
10 were hired on at the same time. And they both  
11 came onboard about the same time.

12 Q. Cathy, you said?

13 A. Cathy Gregoir.

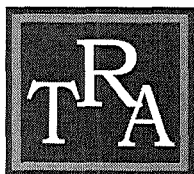
14 Q. And so did you help train Jeff?

15 A. Probably all of us did. We all did. It  
16 was peer training, if he was with us. Questions  
17 were answered, sometimes just by watching. Good  
18 habits and bad habits. You know, sometimes that  
19 is how you pick things up, so it was pretty well  
20 the standard fare as to how we did that back in  
21 those days.

22 Q. All right. Who were your supervisors  
23 during that period? Do you recall?

24 A. Okay. During which period?

25 Q. The 17 years.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Oh, the 17 years?

2 Q. You may have mentioned that a second ago.  
3 You told me --

4 A. Well, Howard Wilcox. And then it -- let  
5 me see who came on after him. Adrian Newbee, I  
6 think. Mike Zatorski, Jimmy Madere, and I think  
7 that is my list of supervisors while I was  
8 operating. Plant manager changed, also.

9 Q. Okay. So George Valentine was never your  
10 supervisor as an operator?

11 A. Never.

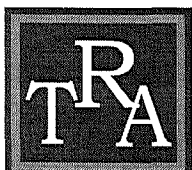
12 Q. And would he have been an operator  
13 working with you?

14 A. We worked together, yeah. We worked with  
15 every operator out there, off and on. You got a  
16 shift partner for a certain amount of time, and  
17 then, of course, vacation relief, so there are  
18 times you work with the other guys or you get  
19 called in for overtime. We worked with everybody.

20 Q. Okay. During your years as an operator,  
21 did you ever -- were there ever occasions where  
22 there were gas leaks at the plant?

23 A. Yes.

24 Q. And back then, before 1996, did they have  
25 anybody in a designated environmental coordinator



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 role?

2 A. Pre-'96, no. It was more or less -- that  
3 was -- that was usually done -- most of the  
4 environmental stuff was done by the then  
5 supervisor.

6 Q. Okay. During --

7 A. Excuse me, there was one gentleman that  
8 did show up toward the end there, a guy named Dave  
9 Fontaine. I forgot about Dave. He sort of kicked  
10 in on some of the environmental stuff.

11 Q. Okay. About what time period? Late when  
12 you were an operator in the 90s?

13 A. Mid 90s. It is hard to put a date on  
14 when he showed up. He also did some computer  
15 work.

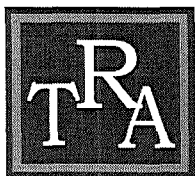
16 Q. All right. So back when you were an  
17 operator, you've had to respond or deal with the  
18 fact that there were gas leaks at the plant on  
19 occasions?

20 A. Every once in a while, yes.

21 Q. And sometimes when there were those gas  
22 leaks during that time period, did somebody make a  
23 decision to cut the rate back at the plant?

24 A. Yes. Typically.

25 Q. And why -- who would make that decision?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. The operators did.

2 Q. So sometimes that would be you deciding?

3 A. Could have been me, could have been my  
4 partner about that time. Yes.

5 Q. And why would it be important to cut the  
6 rates back?

7 A. To reduce the production. Start slowing  
8 the plant down for eventual maintenance. It was  
9 always key at the site, you want to make sure the  
10 plant stayed warm. And then, of course, when it  
11 was time to shut the plant down, we would work on  
12 whatever the problem was.

13 Q. Okay. Do you recall in connection with  
14 those leaks back when you were an operator, that  
15 y'all were able to figure out the problem and stop  
16 the leak?

17 A. Normally.

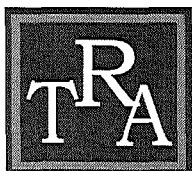
18 Q. Okay. Did you ever -- let me back up.

19 Back then, before '96, when you  
20 were an operator, did you have the option to push  
21 a button or doing something that would actually  
22 shut the plant down?

23 A. Yes, I can push a button.

24 Q. I'm sorry?

25 A. Yes. I can push a button, if necessary.



1 Q. Did you ever do that?

2 A. I don't think I ever just killed it,  
3 killed the plant just by pushing a button. I  
4 think most of my shutdowns -- I mean, there are a  
5 lot of years there. I think most of mine were  
6 sort of organized --

7 Q. Okay.

8 A. -- at that moment. I may have pushed a  
9 button one night. I don't remember. But most of  
10 them, that I remember correctly, were an  
11 organized-type shutdown.

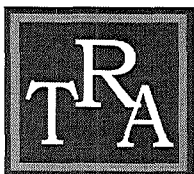
12 Q. Okay. And that is what you would try to  
13 do, if you could; is that right?

14 A. You can try that. That was the correct  
15 way to do it, when possible.

16 Q. When you talk about cutting back the  
17 rates, what kind of rate cut would you implement?  
18 Do you recall?

19 A. It would be a reduction of spent burning,  
20 sulfur burning, so you would slow burners down at  
21 the same time. And upon when you did that, it was  
22 -- just slowed the process down. It wasn't as  
23 much being produced or as much pressure, those  
24 type of things.

25 Q. What is the -- back when you were an



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 operator, what was the maximum rate at which the  
2 plant can operate? Do you remember?

3 A. It has been -- it has increased since  
4 then. Probably maxed out when I was an operator,  
5 might have been 1,800 tons a day.

6 Q. So if you, in one of these occasions  
7 where you had a leak back before when you were an  
8 operator and you wanted to cut the rates, if it  
9 was running at 1,800, what kind of rate cut would  
10 you tend to implement?

11 A. A number. I really didn't look at a  
12 number. I looked at how the plant was looking, if  
13 the rate increase of the leak had slowed down, if  
14 it was controllable at that point.

15 Q. So you would just start cutting the  
16 rate --

17 A. Start dialing in basically at some point.

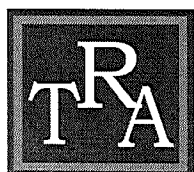
18 Q. So sort of a gradual thing?

19 A. It was gradual. It wasn't a really  
20 drastic cut. You didn't make a real quick, quick  
21 move, but it was methodical.

22 Q. And so you would actually watch the leak  
23 get smaller as you cut the rates down?

24 A. Most of the time, yes.

25 Q. And you can see SO3 gas?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I can see SO3 gas.

2 Q. That is the kind of leak you were able to  
3 watch get smaller?

4 A. SO3, at some point, it is very visible  
5 gas. You can see it decreasing --

6 Q. Okay.

7 A. -- if necessary back in those days. The  
8 locations where all that was located, I don't  
9 remember a lot of leaks on those particular  
10 vessels.

11 Q. Okay.

12 A. Just, there wasn't a lot of leaks at  
13 those spots. Not a lot.

14 Q. Okay. And back then, was that a  
15 single-absorption process?

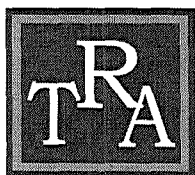
16 A. Yes.

17 Q. What vessels back then do you recall  
18 there being leaks on?

19 A. Absorbing tower had leaks; dry tower had  
20 some leaks; stripping tower. These are just  
21 minor.

22 Q. Okay.

23 A. Some can be handled at that moment. Gas  
24 leaks. I'm trying to remember, storage tanks,  
25 possible storage tanks, those type of things.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. Okay. So you would cut the plant back  
2 and then call somebody?

3 A. Yes.

4 Q. Or --

5 A. Yes.

6 Q. Do you recall this ever happening at  
7 night; did you ever work the night shift?

8 A. Uh-huh.

9 Q. So at night, what would happen if you saw  
10 a leak and you started cutting the rates back; who  
11 were you supposed to call at night?

12 A. I can call maintenance guys, if  
13 necessary.

14 Q. Okay.

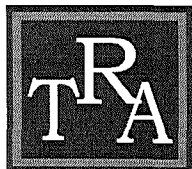
15 A. Sometimes when -- sometimes you cut the  
16 leak back and sometimes it gets to the point where  
17 it is controllable at that point. It is not as  
18 much pressure on whatever that might be.

19 Q. And then you can let the maintenance  
20 people do their work during the daylight?

21 A. Most of the time, we try that. We tried,  
22 unless we needed to get them in at that moment.

23 Q. So you could go straight to maintenance  
24 and make that request, if you needed it?

25 A. Yes. I could.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Or you can make the judgment to wait  
2 until the next morning?

3 A. We were given responsibilities and some  
4 of those were making judgments.

5 Q. Okay. Can you think back to that time as  
6 an operator when there was a leak that couldn't be  
7 fixed for any period of time, where you operated  
8 with a leak for any period of time beyond, say,  
9 24 hours?

10 A. Beyond 24 hours, I think most of those  
11 leaks could have been patched or repaired in those  
12 days within that time frame.

13 Q. Okay. Back then, do you ever recall --  
14 whose job would it have been back then to notify  
15 any kind of emergency personnel or call in  
16 governmental authorities if they --

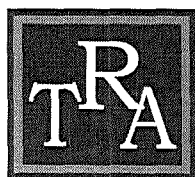
17 A. It would have been the operator's job to  
18 make the call and, typically, in those days, your  
19 supervisor, production guy, usually did that. You  
20 would call them and they typically make the call.

21 Q. Okay. So did you have cell phone access  
22 to your supervisor --

23 A. No cell phone.

24 Q. We didn't have cell phones.

25 So you would just call the landline



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 of the supervisor's house at night, if you needed  
2 to?

3 A. If we needed to.

4 Q. So what -- how did your job change in  
5 1996?

6 A. My job changed because I had a knee  
7 replaced.

8 Q. Okay. Is that the same knee you hurt in  
9 football?

10 A. Yes.

11 Q. And what prompted you to need to have a  
12 knee replacement in '96?

13 A. It was a degenerative process over the  
14 years.

15 Q. Okay.

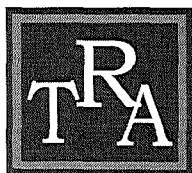
16 A. It was not functioning properly. Pain.  
17 So we got it replaced.

18 Q. Okay. How did that have anything to do  
19 with you changing jobs?

20 A. The decision made back in those days was,  
21 I guess, they called me restricted. I couldn't  
22 climb a lot and those type of things.

23 Q. Okay. So, as an operator, you had to be  
24 able to climb up scaffolding?

25 A. We had ladders and scaffolding and stairs



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 and those type of things. It was part of the job.

2 Q. All right. Do you recall what official  
3 restrictions you had? Was it just climbing or  
4 standing? Sometimes those things can be kind of  
5 formal.

6 A. It was no climbing, no running, those  
7 type of things, the standard fare. That was  
8 probably about it. Most of the climbing piece.  
9 Ladders mostly was the decision. Stairs, of  
10 course, I can walk stairs, but I guess climbing  
11 ladders was a limitation.

12 Q. That sort of made the decision?

13 A. Yes. And it was a decision or choice  
14 that was made by I'm assuming the plant manager.  
15 That is the one who told me -- or actually, it was  
16 a supervisor eventually. We discussed it.

17 Q. Okay.

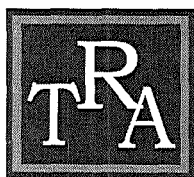
18 A. That my job would change.

19 Q. Who were those people, the supervisor and  
20 the plant manager at that point?

21 A. Okay. Steve Burkel was the plant manager  
22 and Jimmy Madere was the supervisor.

23 Q. So they came to you and basically said --

24 A. I had to explain to them, of course, what  
25 the process I was going through to get the knee



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 replaced. I had to be upfront with those folks.  
2 And then, basically, they told me -- Steve told me  
3 I will not be able to operate the plant anymore.

4 Q. Okay.

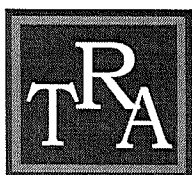
5 A. Because of the limited movement or  
6 whatever you were going to call that. There is an  
7 occasion you have to climb a ladder, so that is  
8 what happened back then. That was, I don't know,  
9 July of '96, I think.

10 Q. All right. And so -- did he tell you --  
11 did he say, therefore, you are not going to be  
12 working here anymore?

13 A. Steve offered me early retirement, which  
14 is the standard fare, when they do that. I  
15 couldn't afford early retirement. They told me  
16 there was a lot of things coming down the pipe as  
17 far as changing the world we were living in at  
18 plant sites, that I could be stuck with some jobs  
19 with paperwork, documentation, so I -- I chose to  
20 take that position, and it really wasn't a name  
21 for it back then.

22 Q. What position did they offer you at that  
23 point?

24 A. I don't know if we had a name. They  
25 called me an operations specialist at some point



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 because it sounded good, I think.

2 Q. So they kind of created a spot for you?

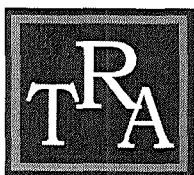
3 A. Well, yeah. There were things that were  
4 going on that needed to be done, the  
5 documentation. The auditing process was -- there  
6 was more audits being done, starting to drift down  
7 to the smaller sites, so there were individuals  
8 who needed to participate in those. There was a  
9 distribution position as far as keeping up with  
10 some of the regulatory stuff in distribution that  
11 was given to me. That was -- there is a lot of  
12 stuff coming my direction. It is sort of hard to  
13 explain, just the different things that were  
14 coming in at different --

15 Q. It was sort of like a catchall?

16 A. Pretty much. It was like a general-duty  
17 job, utility guy. Some plants call them utility  
18 folks nowadays. I guess that would have been a  
19 nice term, "utility."

20 Q. Okay. Were you over only -- or were you  
21 involved only with Dupont issues at that point, or  
22 did you start dealing with other acid plants and  
23 their issues?

24 A. I didn't start actually communicating  
25 with many acids plants until -- the only time I



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

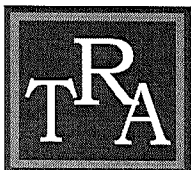
1 got -- maybe some distribution issues because it's  
2 sort of the common theme among the sites. We all  
3 handle the same kind of trucks and same products  
4 and some of those levels. That would have been  
5 the -- that is the first time I got with them.  
6 There were some training pieces with them over the  
7 years that we got simply because of the nature of  
8 the business we were in. Worked with those  
9 fellows in some of those spots, but it was not  
10 something I did every day.

11 Q. Okay.

12 A. It was just special occasions or a  
13 process that we were going through at that moment.  
14 Questions answered, those type of things.

15 Q. Okay. So after you went into that  
16 position that -- did they call it the operation  
17 specialist; is that the name they came up --

18 A. I forgot what they called me. I don't  
19 know who came up with that. It was -- I was what  
20 they call a rhythm coordinator. I used to have  
21 that on my card, which was an acronym, how you  
22 treat hazardous materials which is an old standing  
23 acronym for Dupont. One of the older ones. I was  
24 doing some of that work. I don't know when the  
25 specialist name kicked in. At some point, I think



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 it looked better on the card or something.

2 Q. Okay.

3 A. That would have been probably 2000,  
4 somewhere around there. Maybe.

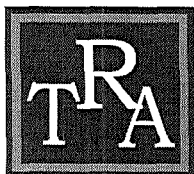
5 Q. So after you started that job in 1996,  
6 did your position change sort of officially at any  
7 point after that?

8 A. Some -- more responsibilities kicked in.  
9 The distribution thing, I kept. After 9/11, I  
10 started working with Ron Cloud. He was -- there  
11 was a security project that was going on as a  
12 result of what happened. We were increasing  
13 fences and cameras and those type of things, so I  
14 was working with him and then the security  
15 challenges at that point.

16 Q. All right. At some point, did you become  
17 in charge of safety at the DuPont Burnside?

18 A. I sort of got that -- I think it started  
19 getting handed off to me around '06, I'm guessing,  
20 '05, '06, somewhere in that general range. It was  
21 not my official title at that point. There was a  
22 lady named Ann Lafarrera. She is what we called  
23 the safety person. She was actually called, I  
24 guess, the SHE professional back then.

25 Q. Safety, health, and environment?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. Yes.

2 Q. And she left?

3 A. I think '07. Somewhere around '06 or  
4 '07.

5 Q. And when she left the safety, part of her  
6 job went to you?

7 A. Temporarily, they said.

8 Q. Okay. And did it stay temporarily?

9 A. Yes. Until officially, I guess, given  
10 the title, the official title last year. I was  
11 doing the job, the safety and the health portion.

12 Q. So you did safety and health from '07  
13 until when?

14 A. Until through the present. But the title  
15 was not safety and health. I just didn't have  
16 that title. It was still operation specialist.

17 Q. What is your current title today?

18 A. SHE consultant now.

19 Q. And when did you get that title?

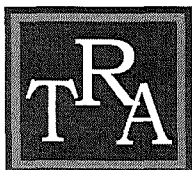
20 A. December of last year.

21 Q. That is December 2012?

22 A. Yes.

23 Q. So you took over safety and health as of  
24 '07?

25 A. In that general area.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. When did you pick up the environmental  
2 piece?

3 A. In -- started really digging into it  
4 January. The title was given to me around  
5 December 15th of 2012. I started in the process  
6 of getting involved in the nuts and bolts of it in  
7 January of 2013.

8 Q. So who did environmental between 2007 and  
9 December 2012?

10 A. Kerry Long was hired.

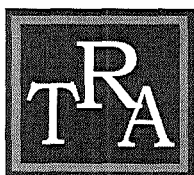
11 Q. Okay.

12 A. Kerry was probably hired 2008 maybe.  
13 There was a project that was fixing to kick in and  
14 they had to have some permitting done, so they  
15 brought Kerry onboard to get the permits in place  
16 from the different regulatory agencies to allow  
17 the process of the project that we were involved  
18 in, so Kerry actually came in as a contractor.

19 Q. Okay. So he didn't replace Ann  
20 Lafarrera?

21 A. He replaced her job but did not replace  
22 her at that point as a DuPonter. Not long after  
23 that, he actually became a Duponter.

24 Q. And when he became a Dupont employee, did  
25 he assume the environmental part of Ann



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Lafarrera's job?

2 A. He had the title of the SHE professional.

3 Q. Okay. So that would cover safety,  
4 health, and environment?

5 A. Yes.

6 Q. But you were sort of doing safety and  
7 health?

8 A. He was doing the environmental. He was  
9 really the environmental part and I was doing the  
10 safety and health part.

11 Q. Okay. Do you know what caused Kerry Long  
12 to leave in 2012?

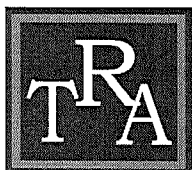
13 A. Greener grass.

14 Q. Okay. Where was that?

15 A. Eagle. That is the people I think he had  
16 previously worked for. It seemed like they gave  
17 him a good offer and he took it.

18 Q. When you took on the safety and health  
19 from Ann Lafarrera, was there any official  
20 transition, or did she give you files or training  
21 or anything like that?

22 A. Well, there really wasn't a hand-off, as  
23 far as Ann saying, this is what you've got to do.  
24 This was things -- she was gone. And, therefore,  
25 I started taking over some of those roles. And we



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 had worked together. Ann and I worked together  
2 well, so some of the things she was doing, I was  
3 doing with her. So it was a really smooth  
4 transition because we worked together at a lot of  
5 different levels.

6 Q. All right. And then when Kerry Long  
7 left, was there any sort of formal transition from  
8 Kerry Long to your role as environmental  
9 coordinator?

10 A. That would have been -- December was the  
11 official title I was given, was in December of  
12 last year.

13 Q. When did Kerry leave? Do you know?

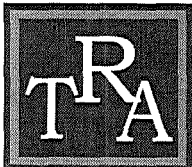
14 A. Around August. I think around August.  
15 Somewhere around there. Yes.

16 Q. So from August 2012 to December 2012,  
17 there was really nobody doing that environmental  
18 job?

19 A. We had a gentleman named Matt Barnes who  
20 was -- he lives in Ohio. He was actually doing  
21 that work, if needed.

22 Q. Tell me about that. What -- did he stay  
23 working in Ohio?

24 A. Yes. Most of the time. He came to the  
25 site off and on. But he was doing the reports



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 there, the required monthly reports, those type of  
2 things that the different agencies have to do with  
3 a deadline, and he was doing those reports and  
4 those types of work.

5 Q. Okay. What reports were the deadline --

6 A. You got reports that have to go to the  
7 water folks. You have -- that is a monthly  
8 report. That is done by the 15th of every month.  
9 You have some quarterly reports, so right then, he  
10 was picking up some of the quarterly things  
11 because of the time -- because of Kerry leaving.  
12 He was picking up on some biomonitoring which is  
13 another part of the water, groundwater. You have  
14 water and you have groundwater reports, air  
15 permits, stack tests, those type of things.

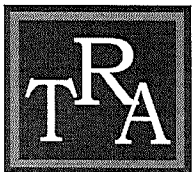
16 Q. Okay. How many times would you say he  
17 came to the site between August and December 2012?

18 A. I don't really keep up with it. Probably  
19 once or twice. I'm guessing on that one because I  
20 really don't remember.

21 Q. But you met him before?

22 A. Yes. I know Matt very well. Matt was --  
23 I worked with Matt off and on over the years. He  
24 is my boss now.

25 Q. Okay. So have you physically worked with



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 him in the past --

2 A. Yes.

3 Q. -- somewhere? And where was that?

4 A. He was a contractor at our site one time.

5 He came on. I think Ann maybe got him there.

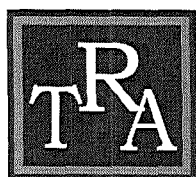
6 He'd did some IH testing. And that is how I met

7 Matt.

8 Q. Okay. So how was he able to do the job  
9 remotely from August to December of 2012?

10 A. Well, the reports that he was doing are  
11 -- all the information is produced -- the  
12 operators had certain responsibilities in keeping  
13 up with spreadsheets that this data was -- it is  
14 part of their daily jobs. They put data into  
15 spreadsheets which the reports were derived from.  
16 Some of this other testing that was done was DCS,  
17 kept up, I guess you would use the word "archive."  
18 But they can pull reports off, and those were  
19 created off existing spreadsheets and  
20 instrumentation through the DCS system.

21 Samples were -- operators, like  
22 Jeff and everybody else, part of their job tasks  
23 were to gather samples every so many days and then  
24 those would be -- would have been sent off for  
25 testing, and that is not typical of what was going



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 on. And all those contracts were set up and in  
2 place.

3 Q. What contracts?

4 A. Well, the analytical labs. Those were  
5 the folks that the samples would have been sent  
6 to, that would have been gathered by the  
7 operators.

8 Q. So what information did the operators put  
9 into spreadsheets that made it into Matt Barnes'  
10 reports?

11 A. Matt Barnes' reports, a lot of that  
12 information flows off of instrumentation, off of  
13 the meters in their control room. Some of that  
14 would have been flowed over a 24-hour period.

15 Q. Flowed through what?

16 A. At this point, it would have been  
17 return-water to the river.

18 Q. So kind of the outfall?

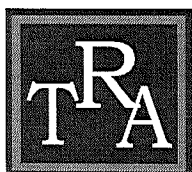
19 A. It would be the outfall.

20 Q. And that was a permitted release?

21 A. Yes.

22 Q. Okay.

23 A. They would also catch samples, run pH's  
24 on those samples. They gathered -- some of the  
25 data is gathered right from the actual DCS, which



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 you can get those reports from. Those reports  
2 actually link to spreadsheets that you can update  
3 and that data actually is populations into a  
4 report once you start changing the dates. It is  
5 an automatic array that sets up and talks to the  
6 reports that are generated by Matt. He can do  
7 those remotely.

8 Q. Okay.

9 A. He was able to do that remotely.

10 Q. That is the permitted outfall. What  
11 other releases was he able to monitor remotely?

12 A. I wouldn't use the term "release," but  
13 what he monitored were those type of things. He  
14 did not have a camera on the plant or anything  
15 like that.

16 Q. So the permitted outfall to the river?

17 A. Yes.

18 Q. And then what about the stack?

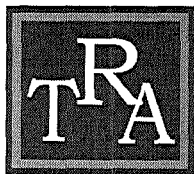
19 A. He can get access to that information.

20 Q. He could access the information --

21 A. Yes.

22 Q. -- pertaining to the stack?

23 A. He can access any information that was  
24 required of him for any of the environmental  
25 reports that had to be made.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. All right. And what areas of the plant  
2 did -- did information have to be gathered from to  
3 go into these monthly or quarterly reports?

4 A. Back to those spreadsheets.

5 Q. The outfall?

6 A. The outfalls. They were numbered 001,  
7 003, 004, 005. Those were numbers that were  
8 designated as outfalls. He could also generate  
9 reports through the DCS systems on what -- I think  
10 it is called I21 now, which gives him access to be  
11 able to get some numbers.

12 Q. For what? I'm trying to understand the  
13 area.

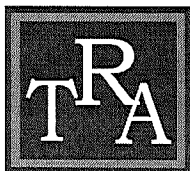
14 A. He was looking at numbers like some of  
15 those flows on 003, 005.

16 Q. That is still outfalls?

17 A. Yes, it's still outfalls. He could also  
18 look at numbers as far as SO2. He had access to  
19 those type of things.

20 Q. Okay. And that is all the outfalls to  
21 the river?

22 A. The ones I just told you about, the 001,  
23 some were going to some plant ditches that leave  
24 the plant site. There are ditches that go out  
25 beyond our property that we are required to keep



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 up with.

2 Q. Okay. So there is the outfalls which are  
3 permitted and the stack?

4 A. The stack is permitted.

5 Q. And where -- so information that pertains  
6 to the stack is also put into a spreadsheet by  
7 operators?

8 A. No.

9 Q. Okay.

10 A. Those numbers -- you can derive those  
11 right off the DCS.

12 Q. All right. And so he was able to do that  
13 remotely?

14 A. Yes, he could.

15 Q. Is there any other area of the plant  
16 other than the stack and the outfalls that he was  
17 able to capture information for to put into the  
18 environmental reports?

19 A. I'm thinking. Not other than those --  
20 those were daily and weekly spreadsheets. The  
21 spreadsheets are done daily. You can look at them  
22 daily if you wanted to. The stack is continuously  
23 monitored. That is 24/7. That is always there.

24 Q. Okay. Who -- how is that monitored 24/7?

25 A. Through the instrumentation on the plant



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 site but through the DCS system. The technology  
2 that we have in place.

3 Q. Okay. All right. So there is a permit  
4 on the stack, as well?

5 A. Yes.

6 Q. And so these permit -- the permit on the  
7 outfall and stack is what makes those monthly and  
8 quarterly reports due to the environmental  
9 agencies?

10 A. Yes. You have numbers that you have to  
11 turn in, depending on what you have to do. There  
12 is a considerable amount of reports that have to  
13 be done. There is a nice long list.

14 Q. And he handled those from August to  
15 December of 2012?

16 A. Yes.

17 Q. And in December or January 2012, you took  
18 over that job?

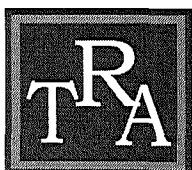
19 A. Yes.

20 Q. All right. And since January of 2013,  
21 you have been the one to submit the reports  
22 that --

23 A. With --

24 Q. Let me finish. I'm sorry.

25 You have been the one to submit the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 reports that pertain to the permitted outfall and  
2 permitted stack?

3 A. Most -- yes. With his help.

4 Q. With Matt's help?

5 A. Yes. He has been in the training  
6 process.

7 Q. Okay.

8 A. That is when he actually became my  
9 supervisor. I started working under Matt. I have  
10 to -- other than Tom -- Tom was my boss and now  
11 Matt is.

12 Q. Okay. And when did that change happen?

13 A. That happened in December.

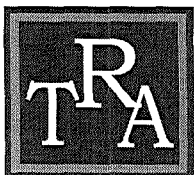
14 Q. Okay. Do you know anything about why  
15 they waited from August to December to put you in  
16 that role?

17 A. I think they were trying to interview  
18 people. They were going through the process of  
19 trying to find somebody to take the job. I think  
20 that is what was going on.

21 Q. Do you know if they did any kind of  
22 internal job posting?

23 A. Yes, I think they did.

24 Q. Do you know if there were any tests for  
25 that job?



1 A. No.

2 Q. They weren't?

3 A. I didn't take a test.

4 Q. And in the job posting, do you recall  
5 there being any tests that was linked to the job  
6 posting for that position?

7 A. Not that I know of.

8 Q. Did you have to take a test when you took  
9 on the safety and health role?

10 A. A DuPont test, like, this is -- no. No.  
11 I came through experience and some certifications  
12 from some other folks, so training I had to have  
13 over the years.

14 Q. Okay.

15 A. That's sort of where I got -- it was  
16 experience, on-the-job training, basically.

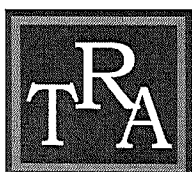
17 Q. In any of your job changes, have you had  
18 to take a test in order to see if you were going  
19 to get the job at Dupont?

20 A. No.

21 Q. Do you know if anybody at Dupont, when  
22 they changed jobs or tried to change jobs at  
23 Dupont, they had to take a test?

24 A. Yes.

25 Q. What job was that?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. When the supervisor's job was originally  
2 offered to Jimmy, there was a test that was given.  
3 I took that test just because I wanted to. I  
4 think there was more than one individual that took  
5 that test.

6           Q. Who took that? Do you know?

7           A. Let's see. I think Clyde Savoy took it;  
8 Jimmy took it; I took it. I don't know if anybody  
9 else did or not.

10          Q. Okay. Do you remember whether you passed  
11 it or not?

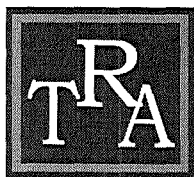
12          A. I passed it.

13          Q. Okay. Do you remember what kind of test  
14 it was? What were they testing?

15          A. Not really. It was just -- I couldn't --  
16 it was one of those tests where they ask you if  
17 you look at a square -- it was a psychological  
18 feel. One of those tests. A little math. It was  
19 a general supervisory-type test asking you for  
20 maybe some scenarios, the decision-making process.  
21 Typical supervisor's test.

22          Q. Do you know of any other jobs where  
23 somebody had to take a test if they wanted to try  
24 to get a job at DuPont?

25          A. Yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. What other ones?

2 A. Nowadays -- and we go back -- I had to  
3 take a test to be considered for the operating  
4 job. I took a preemployment test.

5 Q. Back in 19 --

6 A. '79. Yes. So I took a test for that  
7 job. After that, operators take tests nowadays.  
8 I think every position that I'm aware of, there is  
9 a test-taking process. I don't know -- that is  
10 the ones that I know of. I don't know if Jeff and  
11 Cathy took a test, I'll tell you right now, for  
12 the operator job.

13 Q. Back in the 90s?

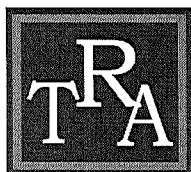
14 A. Back when Jeff came on. I don't know  
15 because I was not involved in that hiring process.  
16 Recently, there has been testing for operator  
17 jobs. I think some maintenance jobs.

18 Q. Okay.

19 A. It is pretty much standard fare nowadays  
20 to have some type of test when you are hiring  
21 people off the streets. I say "off the streets,"  
22 but they make applications.

23 Q. For internal changes of jobs, do you know  
24 of any -- other than the Jimmy Madere position --

25 A. For internal?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Uh-huh.

2 A. I think -- I don't know because I wasn't  
3 privy to some of those activities. I do know -- I  
4 heard that Herb and Jeff and Kent had to take a  
5 test.

6 Q. For what position?

7 A. That would have been -- I guess for lack  
8 of a better word, a logistical-type job. That is  
9 what we were calling it. It was an individual who  
10 basically took care of the needs of the railroad  
11 and those type of things.

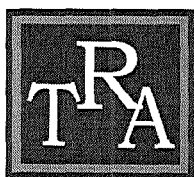
12 Q. Can you think of any other internal job  
13 changes where the people who were applying for  
14 that position had to take a test?

15 A. I don't know if they took test or not. I  
16 know the jobs were posted. I don't know if they  
17 took tests or not.

18 Q. All right. So the only two you can think  
19 of are the logistical job and the one back when  
20 Jimmy Madere was made supervisor?

21 A. Yes. There may have been more, but I  
22 don't know about them. I didn't get privy to a  
23 lot of things out there.

24 Q. So you have been training with Matt  
25 Barnes since January 2013 in the environmental



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 part of your job?

2 A. Yes.

3 Q. And what training -- what has that  
4 training included?

5 A. It has been peer training. He has been  
6 coming to the plant probably once a month. This  
7 filling the actual turning in of the reports,  
8 working together on those. I was assigned to go  
9 to some outside training in La Porte, Texas, so I  
10 went to about a week of training there.

11 Q. In La Porte?

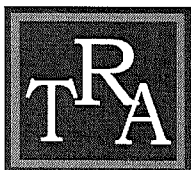
12 A. La Porte. Yes. It was a RCRA course  
13 that I had to go to. That is probably the most  
14 training I've had. Most of it has been one-on-one  
15 with Matt.

16 Q. All right. And has Matt's one-on-one  
17 training been focused on the reports, or is there  
18 some other aspect of his training?

19 A. Most of it has been geared toward the  
20 reporting process.

21 Q. And that's the reporting to the outfall  
22 and the stack?

23 A. Yes. These are very detailed reports.  
24 And there is a way you have to do it and there is  
25 letters, people you have to mail it to and



**TORRES REPORTING & ASSOCIATES, INC.**

**COURT REPORTING & LITIGATION SERVICES**

**tra@torresreporting.com**  
**www.torresreporting.com**

**Baton Rouge, LA**

**225.751.0732**

**225.752.7308 FAX**

**New Orleans, LA**

**504.392.4791**

**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 deadlines and those sort of things, so...

2 Q. And those are for the outfall and the  
3 stack?

4 A. Yeah, some of them are detailed. Some of  
5 them are like every five-year reports. So some of  
6 those, I think, came just by timing. I think one  
7 of the reports I got involved in was one that is  
8 done every three to five years. I would have to  
9 double-check. And then we just sit and work  
10 together on those.

11 Q. Okay. Who do the reports go to with  
12 regard to the outfall and the stack?

13 A. Louisiana Department of Environmental  
14 Quality.

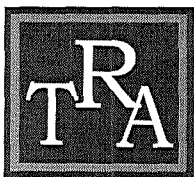
15 Q. Do all of these  
16 monthly/quarterly/three-year reports, they all go  
17 to the same place?

18 A. Most of those do. I think there is some  
19 that go to the EPA eventually.

20 Q. Eventually?

21 A. Yes. EPA is the one that, I think, I  
22 have done one or two of those with Matt. I  
23 haven't done any by myself, I'll tell you right  
24 now.

25 The water reports I have started



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 doing on my own because -- I figured that one out,  
2 but those are going to the DEQ, Louisiana  
3 Department of Environmental Quality.

4 Q. What goes to EPA?

5 A. There is some data for some air  
6 permitting. They call it Title V, which is a  
7 pretty big report. And I think it was recertified  
8 this year with -- and I stood in the background  
9 and Matt did most of it. He did most of that work  
10 and I just sort of observed.

11 Q. Okay. So the Title V permit got  
12 recertified this year?

13 A. I think so.

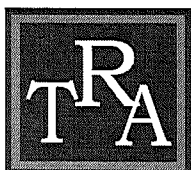
14 Q. In what month?

15 A. I would have to go look. First -- I  
16 think before June, but it is not in my head right  
17 now. Sometime before June, I think.

18 Q. All right. So you have to do reports or  
19 you and Matt have had to do reports to EPA  
20 regarding the Title V permit?

21 A. We did that this year. We went through a  
22 web portal, which I had to get access to, and that  
23 is how that report was generated.

24 Q. Okay. Have you done any other reports to  
25 EPA for any other issue other than the Title V



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 permit?

2 A. Not -- no. I haven't.

3 Q. And if Matt does a report since December  
4 of 2012, if Matt has done a report, have you been  
5 aware of that for the Burnside plant?

6 A. Yes. Because we get those reports back.  
7 We do get -- we keep copies and -- there are some  
8 reports that are generated by vendors, as far as  
9 people that are hired to do these type of things,  
10 and I usually get a binder or something like that  
11 from those folks.

12 Q. Who are "those folks"?

13 A. Let's see. Eagle, Metco, I think that is  
14 the two of them I worked with mostly this year.

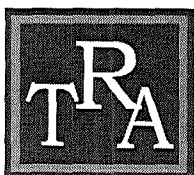
15 Q. And what do they report about? The  
16 outfall?

17 A. Some of that is outfall information and  
18 some of it is stack information. Some of it is  
19 some groundwater information. There are some  
20 wells out there. They do well sampling. We call  
21 them "wells," but it is actually simply the water  
22 below the surface.

23 Q. So that is a third source of information

24 --

25 A. Yeah --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. You got outfall --

2 Wait, let me finish the question.

3 A. Okay. Got you.

4 Let me get a drink of water.

5 Q. Okay.

6 MS. WEINER:

7 In fact, why don't we let him take  
8 a break and we can talk about lunch.

9 (A brief recess.)

10 BY MS. BARNEY:

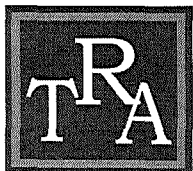
11 Q. We were talking about, I think, the  
12 vendors who do reports.

13 A. Sure.

14 Q. And you mentioned that they do some  
15 reports for the outfall and maybe some  
16 groundwater?

17 A. They do groundwater, outfalls. Some of  
18 the data you get, you use it like the air, Title V  
19 stuff. But that is usually generated by us. It  
20 is basically a spreadsheet. It is a Government  
21 fill-in-the-blank thing.

22 Q. Earlier, we were talking about, I guess,  
23 about -- I was saying there were two areas that  
24 you and Matt and maybe these vendors participated  
25 in reports with regard to. And I was talking



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 about the outfall and the stack, which is the  
2 Title V permit, but there is really a third area  
3 which is the groundwater?

4 A. Groundwater. Yeah. There is -- those  
5 are tests that are done quarterly or monthly.

6 Q. And so that is the three areas --

7 A. And they are concerned with some of the  
8 reporting that you do is geared through spill  
9 control.

10 Q. Spill control?

11 A. Spill control. They have what they call  
12 an SPCC. There is also reports, what they call  
13 storm water. If you get heavy, heavy rain, what  
14 do you do with your rainwater; what do you do with  
15 it basically. Storm-water prevention plans.

16 Q. Okay. And which vendor does those?

17 A. I think Eagle did that one.

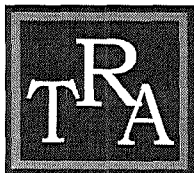
18 Q. That is the storm water?

19 A. Yes.

20 Q. What about the spill control?

21 A. That would have been Eagle. I think that  
22 is Eagle, also.

23 Q. When Eagle does the spill-control work  
24 and the storm-water work, who generates reports  
25 based on that work? Does Eagle do it or does



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

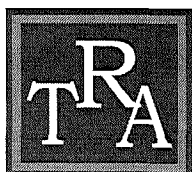
1 DuPont?

2 A. Those reports are sort of -- it is like  
3 -- I'm not going to say it is a report. It is  
4 more of a guideline and you update them annually  
5 and you give them information back like have you  
6 increased sums, do you have a new source for a new  
7 ditch, or something like that.

8 Q. You report on changes to the process --

9 A. Changes and those are types -- I call  
10 them reports, but those plans are accessible and  
11 have to be submitted to the State, but it is your  
12 way of protecting it or doing what you do to  
13 protect the storm water, what procedures are in  
14 place, what are the projects coming up that we  
15 might be doing to improve, and it is a pretty -- I  
16 say it's a generic plan. It is specific to the  
17 site, but I'm sure the wording can be punched in  
18 just about any -- not only at the DuPont site but  
19 possibly any site just because of the way the  
20 wording is when they create those. It is very  
21 specific to our site when we start talking about  
22 actual parts of the plant.

23 Q. I meant to confirm earlier, and I  
24 confirmed off the record, but Ms. Wiener is  
25 representing you here today?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Okay.

2 Q. Right?

3 A. She can.

4 Q. Okay. And did you understand when you  
5 were asked to give a deposition what the case was  
6 about that you are here?

7 A. Yes.

8 Q. What is your understanding of the case?

9 A. My understanding right now, and I've seen  
10 the document because I get those, and it is the  
11 TSCA case that we are talking about right now.

12 Q. And when you say you have seen the  
13 document --

14 A. Well, we get copies of what's called  
15 legal holes that come from somewhere. I don't  
16 know who sends them. I get them dumped on me all  
17 the time.

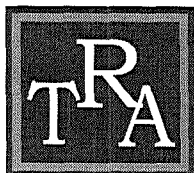
18 Q. Okay.

19 A. And it can be from any type of litigation  
20 against DuPont, period. I see them for just about  
21 whatever product we sell.

22 Q. Okay.

23 A. And I saw this one.

24 Q. And that is kind of in your role of  
25 safety and health and environment?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1           A. I think I get those because of that. I  
2 don't know. Yeah, probably, because that is my  
3 title now.

4           Q. All right.

5           A. I don't think I was getting those -- I  
6 see a few generic -- but it seems like I'm getting  
7 more.

8           Q. Are you -- would you say you're the point  
9 person for that at Burnside, or do you just get a  
10 copy?

11          A. I get copies. I think those are spread  
12 around.

13          Q. So have you actually read the complaints  
14 that were filed in this case?

15          A. Yes.

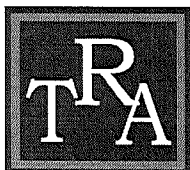
16          Q. So you are familiar with the facts that  
17 are alleged in the complaint?

18          A. I don't remember the complaint verbatim,  
19 but I'm familiar.

20          Q. I'll represent to you that there has been  
21 testimony in the case that there are some gas  
22 leaks going on at the DuPont Burnside plant.

23          A. Uh-huh.

24          Q. And I believe -- we've deposed Lonnie  
25 Blanchard, Robbie Cayette, and Percy Bell.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I know every one of them.

2 Q. And they've talked about gas leaks going  
3 on at the plant.

4 Do you have any reason to dispute,  
5 as you sit here today, that there are gas leaks  
6 going on at the DuPont Burnside plant?

7 A. There have been gas leaks. There have  
8 been repairs of those gas leaks.

9 Q. Okay. When is the -- let me just  
10 clarify. We are talking about gas leaks from the  
11 CIP, the HIP, the converter, the super heater,  
12 maybe ductwork and plenums that are attached to  
13 that -- that is your understanding of the gas  
14 leaks that --

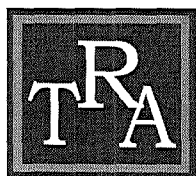
15 A. I think those are the ones in question.  
16 HIP and CIP is the one I keep seeing the...

17 Q. When is the first time that you were  
18 aware of those gas leaks?

19 A. The first time?

20 Q. Uh-huh.

21 A. That I probably -- when I started seeing  
22 -- I think in the 2012 range, maybe the end of  
23 2011 some things may have been starting on those  
24 vessels as far as some potential leaks. And then,  
25 of course, some different ones in 2012. And, of



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 course, there have been a few this year.

2 Q. Okay. The testimony so far has been that  
3 the vessels themselves are leaking and that there  
4 is some mitigation effort going on with hoses and  
5 the vacuum system. Is that your understanding?

6 A. Yes.

7 Q. Okay. Would you dispute that the vessels  
8 have been leaking since December 2011, maybe  
9 December -- around the December 21, 2011 time  
10 period, right before Christmas of 2011?

11 A. I wouldn't dispute that.

12 Q. Okay. And setting aside for right now  
13 this recent turnaround that took place in  
14 September/October, from the December 21, 2011 time  
15 period until that shutdown --

16 A. The one we -- we just finished up, okay.

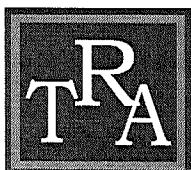
17 Q. Yeah, late September, early October.

18 A. Okay.

19 Q. Between the time period of December 21,  
20 2011 and this recent shutdown in early October,  
21 those gas leaks leaked pretty much the whole time,  
22 right; they were never repaired?

23 A. Yeah. Well, there was repairs made on  
24 those vessels.

25 Q. Okay.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. I wasn't there all the time, of course,  
2           if they were leaking all the time, but I know  
3           there were repairs done, shutdowns were taken to  
4           repair those.

5           Q. But the repair efforts never stopped the  
6           leaks completely; is that your understanding?

7           A. The repair efforts may have stopped them  
8           for a time frame, and then they started back up,  
9           and that is when the hoses, which I know that --  
10          I'm aware of were used.

11          Q. If Lonnie Blanchard, who I think you know  
12          as the KBR maintenance guy, testified that they  
13          were never able to fix all the leaks in that time  
14          period, would you dispute that?

15                MS. WEINER:

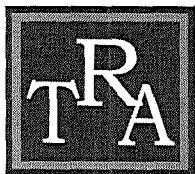
16                   I'll object to the form to the  
17                   extent that it may mischaracterize Mr. Blanchard's  
18                   testimony, but you can go ahead.

19                THE WITNESS:

20                   Restate your question.

21                BY MS. BARNEY:

22                Q. If Mr. Blanchard testified that there  
23                were leaks ongoing since December 2011 without  
24                ever having a time period where the leaks were all  
25                fixed up until this shutdown, would you dispute



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 that?

2 MS. WEINER:

3 Same objection.

4 THE WITNESS:

5 I would think at some points they  
6 were probably fixed and reoccurred.

7 BY MS. BARNEY:

8 Q. What is your basis for saying that?

9 A. Shutdowns.

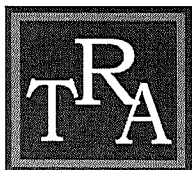
10 Q. Okay.

11 A. And then starting the plant back up, and  
12 just due to the fact that they happened again. I  
13 know that. I'm not -- there is no denial of that.  
14 I think those could have been momentary or a day  
15 or two or three or whatever, but I just can't give  
16 you that detail of an answer. I think it has been  
17 a maintenance issue for a while. And that is  
18 pretty well understood.

19 Q. All right. Have you had any direct  
20 responsibility, until you took over, let's just  
21 set aside your new job starting with January 2013,  
22 before that, did you have any direct  
23 responsibility for those gas leaks?

24 A. What do you mean "responsibility"?

25 Q. Did your job involve dealing with those



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 gas leaks in any way?

2 A. Me going out there and actually doing  
3 something or telling somebody to do something, is  
4 that what we are talking about?

5 Q. Yes.

6 A. No.

7 Q. Did you have to participate in meetings  
8 or do any paperwork related to those gas leaks?

9 A. No.

10 Q. All right. Starting in January 2013 --

11 A. Okay.

12 Q. -- have you had any direct involvement  
13 working with the gas leaks?

14 A. I haven't. Not that I would go out and  
15 tell somebody how to do their job, no.

16 Q. Have you had to participate in any  
17 meetings or anything since January 2013 about the  
18 gas leaks?

19 A. I haven't.

20 Q. You have not?

21 A. I have not participated. Now, there were  
22 maintenance meetings that I sat in discussing what  
23 was going to be done in the shutdown, and, of  
24 course, those vessels came and -- they talked  
25 about them, as well as other issues that needed to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 be prepared.

2 Q. Okay.

3 A. So I was not sitting in a specific HIP  
4 and CIP meeting, if that is what you...

5 Q. Or a specific environmental coordinator  
6 meeting?

7 A. No.

8 Q. Okay. About that?

9 A. No.

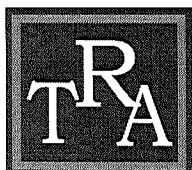
10 Q. What about any paperwork, since you  
11 started the environmental job in December,  
12 January 2013, have you done any environmental  
13 paperwork in connection with the gas leaks?

14 A. I have -- I've seen some of the first  
15 reports. I didn't actually create any of the  
16 first reports. I have -- we've discussed some of  
17 the way the reports were to be written up in our  
18 reporting mechanism. I've also have had to deal  
19 with some of the people that have followed up some  
20 of the regulatory types that have followed up on  
21 some of the reports that were made.

22 Q. Okay. Anything else that you can think  
23 of?

24 A. No. That is about it.

25 Q. When you say "first report," are you



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 talking about something called Burnside Initial  
2 Incident --

3 A. That is what I call it.

4 Q. -- Report?

5 A. First report. I see those. I haven't  
6 created one.

7 Q. You've never created one?

8 A. I created not for this particular piece  
9 right here.

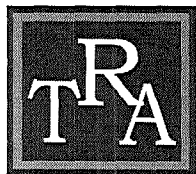
10 Q. When is the first time you say you  
11 created one?

12 A. A year ago maybe. Something like that.  
13 I typically don't get involved in the creation of  
14 those.

15 Q. What occasion prompted you to fill one  
16 out on your own?

17 A. I think it was a smushed finger or  
18 something. Something like that. And I just  
19 happen to be there and did it because it had to be  
20 done, so that is how I did it. Most of the time,  
21 it is done by the guys in the field, the  
22 maintenance guys, the operators. Maybe their  
23 supervisor.

24 Q. You never filled one out back when you  
25 were an operator?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. I didn't have those back then.

2 Q. Do you remember when those first came  
3 into use at Burnside?

4 A. The first reports, Tom Miller.

5 Q. Okay. Do you know whether Matt Barnes  
6 has had any involvement with these gas leaks?

7 A. He is aware of them. Yes.

8 Q. And when would you say he first became  
9 aware of them? Do you know?

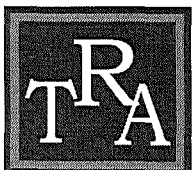
10 A. I'm sure he has been aware of them -- I  
11 can't speak for Matt, but I'm sure there is an  
12 awareness through his job, and I don't know how  
13 far back that would be.

14 Q. When is the first time you knew that he  
15 was aware?

16 A. That I knew he was aware? I can't  
17 specifically say when I knew the first time he was  
18 aware. I don't know.

19 Q. Well, back when -- you have this time  
20 period in your mind of like December 2011. Was it  
21 pretty much plant-wide knowledge in December 2011,  
22 or do you think Matt learned about the gas leaks  
23 sometime later?

24 A. I couldn't say what Matt learned in 2011.  
25 I don't know what Matt learned in 2011. I would



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 say, on the second part of your question, it was  
2 general knowledge.

3 Q. Okay. When is the first time you talked  
4 with Matt Barnes, if ever, about the gas leaks at  
5 the Burnside plant?

6 A. Off and on, probably through this year  
7 because of some of the conversations/visits we  
8 have had from regulatory people, phone calls. I  
9 would tell him and let him know what was going on.

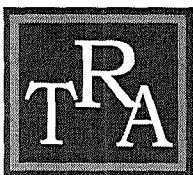
10 Q. So when -- and I think you produced some  
11 documents today that may be speaking to that  
12 issue. Maybe during the break we'll shoot a  
13 couple of copies of these, but if you can look at  
14 them briefly for me.

15 The first document is an interview  
16 form and it is dated September 12th; is that  
17 right?

18 A. Yes. This is the DEQ gentleman coming to  
19 the plant.

20 Q. So is that kind of the time period that  
21 you recall being the first time you talked with  
22 Matt about the gas leaks?

23 A. Yes. Probably. Because I let him know  
24 that we had a visit. I always let him know when  
25 something like this takes place.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. So did you call Matt after this interview  
2 or during the interview, before it?

3 A. After. I think.

4 Q. After, okay. So you actually met with  
5 somebody from DEQ on September 12th?

6 A. Met with these two gentlemen and I think  
7 there was another guy with him. I can't remember.

8 MS. BARNEY:

9 Why don't we go ahead and mark this  
10 group, I guess. If it's okay, I'll mark the first  
11 three pages of the group of six pages that you  
12 guys produced to me today. We'll mark the first  
13 three pages as Exhibit 2 to your deposition and  
14 those are Bates labeled DSF13 through 15.

15 MS. WEINER:

16 They are actually DSF10013.

17 MS. BARNEY:

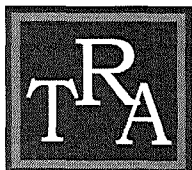
18 Yeah. Sorry. 10013.

19 (Whereupon, the document referred to is  
20 marked as Exhibit No. 2 for identification.)

21 BY MS. BARNEY:

22 Q. So the two gentlemen you are referring to  
23 are down at the bottom of the page next to the  
24 word "inspectors"?

25 A. Yes. Those are the guys that actually



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 did this report. They showed up at the site and  
2 they can do that when they want to. Most  
3 regulatory people can.

4 Q. All right. Can you read for me their  
5 names right there?

6 MS. WEINER:

7 Why don't you give her that copy.

8 THE WITNESS:

9 It looks like Jason Fontenot.  
10 There was a gentleman named Matt Gregory and there  
11 was an Asian guy, and for me to say his name, it  
12 is Z-H-A-O. That is his last name. And I don't  
13 have any clue as to -- Yanfu. That is about as  
14 good as I can get.

15 BY MS. BARNEY:

16 Q. So there were three inspectors?

17 A. I think one of them was a trainee guy,  
18 the way he acted. And the other two were doing  
19 most of the questions and observations.

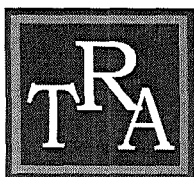
20 Q. Which one did you get the impression was  
21 the trainee guy?

22 A. Gregory.

23 Q. So that was a surprise visit, I guess?

24 A. Yeah. They just showed up.

25 Q. And did they meet only with you or who



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 else, if anybody?

2 A. They met with me. I think I may have  
3 introduced them to Tom. Typically, that is what  
4 we try to do is let them know, let them meet the  
5 boss, the man that -- the guy that would  
6 eventually put his name on there. But I did most  
7 of the work with them that day.

8 Q. When they arrived at the plant, do you  
9 know who they asked for? How did they find their  
10 way to you?

11 A. They come through the front door and they  
12 -- when DEQ shows up -- so the girl in front calls  
13 me. That is how they got to me.

14 Q. Okay. Because as of January 2013, you  
15 are the environmental --

16 A. I'm the guy.

17 Q. -- person at --

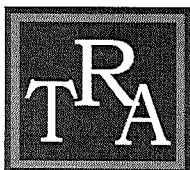
18 Now, is this just for the Dupont  
19 Burnside site?

20 A. Yes.

21 Q. You don't have any environmental  
22 responsibilities over other acid plants?

23 A. No.

24 Q. Do you know whether Matt Barnes has any  
25 responsibility --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. Yes. Matt has, I think, responsibility  
2 for probably most of the acid plants now. He is  
3 -- he has maybe three more people, maybe four more  
4 people sort of like me at the different sites.  
5 And they answer to him. He also has some safety  
6 guys that answer to him. He probably has five,  
7 eight or nine people. I don't know all these  
8 folks, but he does have responsibility for, I  
9 think, all the acid plants in some shape, form, or  
10 fashion.

11           Q. Do you know who he reports to?

12           A. I think it is Guy Tenini. I think that  
13 is who he reports to.

14           Q. Okay. So DEQ comes to visit and you  
15 don't get anybody in that meeting; it is just  
16 you --

17           A. Uh-huh.

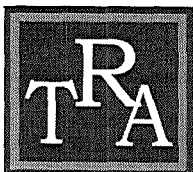
18           Q. -- handling it?

19                       Were you tempted to get Matt on the  
20 phone for that meeting, or did you feel prepared  
21 to handle it?

22           A. The questions they were asking that day,  
23 I was prepared.

24           Q. What were they asking?

25           A. Well, most of that -- they wanted to walk



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 around the plant. They looked at the copy of the  
2 Title V, I think, that day. I think they went to  
3 the control room and probably talked to some  
4 operators to talk about how the report is  
5 generated for the stack, those type of things,  
6 where the instrumentation is. Some of those guys  
7 -- when they do those kind of things, they usually  
8 show them that screen that Jeff is familiar with,  
9 the screen of the stack, and they point that out  
10 to them. I think that is what went on that day.  
11 And then we went on tour.

12 Q. And you took them on a tour?

13 A. Yes.

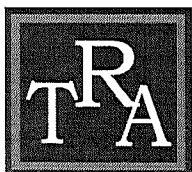
14 Q. Was the plant operating?

15 A. Yes.

16 Q. And where did you take them at the plant?

17 A. I walked them around the plant. I went  
18 to the, I guess, that would be east and took a lap  
19 around the plant. Headed east and came back north  
20 and then headed west and came back down the south  
21 or headed south and we ended up back where we  
22 started.

23 Q. Did -- I'm looking at your report. You  
24 did a report after Page 1014; is this something  
25 you filled out?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. WEINER:

This is a different one?

THE WITNESS:

Yeah, this is a different --  
totally different visit right here.

BY MS. BARNEY:

Q. So let's go back to the September 2013  
visit.

Did you have any discussions with  
the DEQ inspectors about the hoses that were  
connected to the HIP and the CIP and the  
converter?

A. No.

Q. Did they ask you about those hoses?

A. No.

Q. And you didn't volunteer anything about  
the hoses?

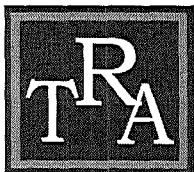
A. No.

Q. Did they ask anything about SO3 leaks in  
general?

A. No.

Q. So the focus of that visit was on  
permitted releases?

A. I think they looked at the Title V and  
that information is on there. It was not that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 long of a visit. And they looked at that. And  
2 then they walked around the plant and were gone.  
3 Maybe, I don't know how long that was, an hour  
4 maybe. I didn't keep up with the time. It seemed  
5 longer when you get visits like that.

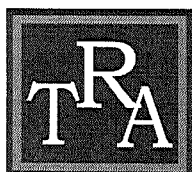
6 Now, I can tell you what those are.  
7 Through-put, they did look for the through-put  
8 records which is a document that shows the amount  
9 of product, I think, that was created in the  
10 following year. And there is documents, like you  
11 look at for the amount of trucks that you deal  
12 with, the amount of sulfur that is brought in, and  
13 the amount of raw product that is brought in, and  
14 there is a spreadsheet that has all those  
15 through-put numbers with them and they went  
16 through that. Of course, they did the visit to  
17 the control room. Part of that time, I left them  
18 by themselves, and I guess that is it. I think  
19 that's it.

20 Q. Who filled out the document that is Bates  
21 No. 1013?

22 A. Which one is that?

23 They did.

24 Q. So they put the responsible official as  
25 Tom Miller?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. That is always that way. The plant  
2 manager is the one that goes in jail.

3 Q. I'm sorry?

4 A. No, the plant manager always puts their  
5 name on stuff. That is the bottom line.

6 Q. Who put that name there?

7 A. They did. They put Tom Miller.

8 Q. And then I see you are there as the  
9 facility representative right above that?

10 A. Yes. That is what I had to do, yes.

11 Q. So Tom is listed as the responsible  
12 official?

13 A. That is the way it is written up. Yes.  
14 That is where the buck stops.

15 Q. And these phone numbers, are they  
16 direct-dial numbers at Dupont, or are those cell  
17 phones?

18 A. Which numbers are we talking about?

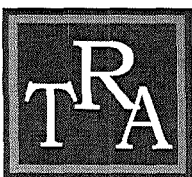
19 Q. The -- your phone number listed there  
20 and --

21 A. Yeah. That is a landline.

22 Q. To Dupont?

23 A. Yes. That is my office and that his  
24 office.

25 Q. And did the through-put records, those



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 records pertain to the amount of stack emissions;  
2 is that the relationship there?

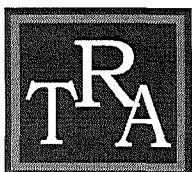
3 A. I would have to go look. I would have to  
4 look on that one. I know there was a lot of  
5 information they looked at on those and I would  
6 have to look and see what exactly all that was.  
7 That was the first time that I think I've seen the  
8 through-put records. I knew about them and I was  
9 able to find them. And they -- I just handed it  
10 to those guys. I don't know everything that was  
11 on those records.

12 Q. Okay. Where are those records kept?

13 A. It was in a file. And, I think, I also  
14 got some information on some of the numbers like  
15 sulfur and those type of things from Meta.  
16 Because the orders, what you order, or the  
17 quantities, they are coming into the product, raw  
18 products and that type of thing. It is not off  
19 the top of my head.

20 Q. So you got some of the documents from a  
21 file and then you got some from Meta that had to  
22 do with sulfur?

23 A. I'm just saying that. Yeah. Since she  
24 does the logistical stuff, she's usually my  
25 source, I go to her because she has that data.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And I'm talking about just for this  
2 report. What did you direct --

3 A. I think that is it because, like I said,  
4 the through-put terminology, I think I may have  
5 seen that one more time previous to this.

6 Q. Okay. Are you aware of any report to any  
7 governmental agency with regard to the gas leaks  
8 from the HIP and the CIP and the converter?

9 A. Yes.

10 Q. That has been made by DuPont?

11 A. By Dupont?

12 Q. Yeah.

13 A. I think those yesterday might have been  
14 some information that was sent. I got to look at  
15 those.

16 MS. WEINER:

17 I'm not sure what you are talking  
18 about.

19 THE WITNESS:

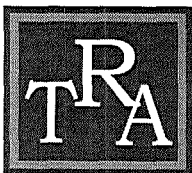
20 Those are the ones that I sort of  
21 chased down the documentation.

22 MS. WEINER:

23 You are talking about these?

24 THE WITNESS:

25 Yeah. These are just calculations.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 MS. WEINER:

2 Is that what you were thinking in  
3 your mind?

4 THE WITNESS:

5 Yeah. That's just calculations.

6 I'm not aware of any report that  
7 was made to the government or a regulatory group  
8 about gas leaks. I'm not aware of it.

9 BY MS. BARNEY:

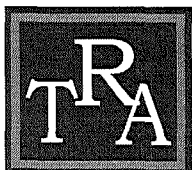
10 Q. All right. Do you have in your office or  
11 do you have access to any environmental reports  
12 that were sent out regarding the DuPont site since  
13 December of 2011, sent to the governmental  
14 agencies?

15 A. What do you mean?

16 Q. Anything that DuPont reported to  
17 governmental agencies since December 2011, would  
18 that be something that you have access to in your  
19 position?

20 A. I have access if there is anything  
21 sitting there. I think I can find it if I needed  
22 to.

23 Q. So when you took on this role in January,  
24 did -- nobody said, oh, by the way we have to  
25 report these gas leaks on the HIP and the CIP?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. No. Nobody said you have to do that. It  
2 is understood. There is an understanding what has  
3 to be reported. Most of that, I think, in some  
4 case, I think one was reported from the control  
5 room one time.

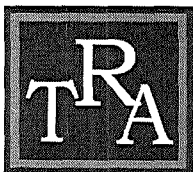
6 Q. Okay.

7 A. There is a reporting feature that  
8 everyone is aware of. There are notifications and  
9 that is in your emergency response manuals. There  
10 is a notification procedure. There are things  
11 that are sitting there.

12 Q. When you took over this environmental job  
13 in January 2013, as far as you know, nobody had  
14 previously reported to any governmental authority  
15 that there were gas leaks coming from the HIP and  
16 the CIP; is that right?

17 A. No. That is not right. There was some  
18 reporting done, I think, at nighttime because  
19 these gentlemen told me they came out there at  
20 night and there were some reports at night. And I  
21 think Tom showed up one night because of some  
22 reports that were sent to those agencies that  
23 night.

24 Q. Okay. Now, was this before you took over  
25 in January?



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Yes.

2 Q. Do you know what time period that was?

3 A. I think Jeff was still there. One of  
4 them I know for a fact. The other ones -- that is  
5 the one I'm aware of.

6 Q. Okay.

7 A. That --

8 Q. So you think that there was actually a  
9 report to a governmental agency --

10 A. No, somebody was called that night. I  
11 don't know if it was DEQ, but there was -- I think  
12 they were called from the control room that night.

13 Q. Okay. And I guess what I'm trying to  
14 understand, has Dupont done an official  
15 environmental report to a governmental agency?

16 MS. WEINER:

17 I think the disconnect may be  
18 verbal versus written --

19 MS. BARNEY:

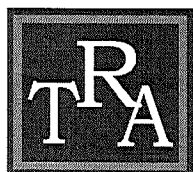
20 Okay.

21 MS. WEINER:

22 -- when you are saying "report."  
23 That may help to clarify the issue.

24 BY MS. BARNEY:

25 Q. Are you aware of any written report to



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 any governmental agency?

2 A. Not with these. There were some verbal  
3 reports.

4 Q. Let's go back to kind of this formal  
5 report process.

6 A. Sure.

7 Q. Earlier, you were talking about having to  
8 work with Matt Barnes to do these environmental  
9 reports in your job and that started January 2013.

10 A. Yes.

11 Q. My question is: Have there been any  
12 formal written reports by DuPont about the gas  
13 leaks that we are talking about here today, the  
14 gas leaks that started in December 2011,  
15 pertaining to the HIP, the CIP, the converter and  
16 that equipment?

17 A. Not that I know of.

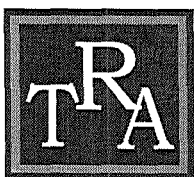
18 Q. Okay.

19 A. I'm not aware of any.

20 Q. All right. So you were talking a minute  
21 ago about you think there was a phone call from  
22 the control room to someone?

23 A. I think so.

24 Q. Who do you think the phone call was made  
25 to?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. I think it was made to the DEQ. I think.

2 Q. And was it made from a Dupont phone?

3 A. I don't know.

4 Q. And what is your understanding of that  
5 phone call?

6 A. That it was reported that night and I  
7 think the call was also made to Tom reporting that  
8 -- of that same incident. I think. I know Tom  
9 went out there to follow-up on it and I think  
10 those guys showed up one night. I think that is  
11 the same time we are talking about, because one of  
12 these gentlemen, and maybe both of them, said they  
13 had come out that night.

14 Q. What night are -- we don't know what  
15 night?

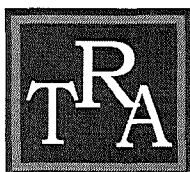
16 A. Back, I think, whenever Jeff was still  
17 there. I can't give you a specific date. But I  
18 think that was the time frame.

19 Q. Okay. So sometime between December 2011  
20 and May 2012, you think that DEQ came out at night  
21 and met with Tom Miller?

22 A. Some time frame, yes.

23 Q. And who made you aware of that?

24 A. It was known. I think they put it in a  
25 logbook. I don't know. I didn't look at the log.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Okay.

2 A. We just knew they were out there. It is  
3 pretty common knowledge if somebody shows up out  
4 there. It is there.

5 Q. So DEQ came to the control room; do you  
6 know where they went on the site?

7 A. I have no idea where they came that  
8 night. I wasn't there.

9 Q. Do you know if anybody showed them the  
10 hoses and the vacuum system?

11 A. That night?

12 Q. Right.

13 A. I don't know.

14 Q. Okay. Do you know who met with them that  
15 night?

16 A. All I know, that particular one that I'm  
17 talking about, I think Tom came out to the site.

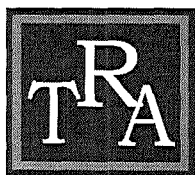
18 Q. Okay.

19 A. That is the only one I know about. I  
20 don't know of --

21 Q. I'm sorry. Go ahead.

22 A. I don't know who they talked to that  
23 night or who came out there or what went on.

24 Q. Okay. And so you don't even know whether  
25 DEQ was told about the hoses and the vacuum



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 system; is that right? At that point?

2 A. I'm not aware of it.

3 Q. Okay. And you don't know what parts of  
4 the plant DEQ walked around, if any, that night?

5 A. No, I don't.

6 Q. Do you have any documents as the  
7 environmental coordinator that would sort of  
8 document that visit or any of the conversations  
9 that happened?

10 A. No.

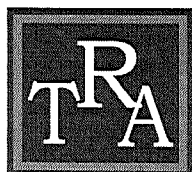
11 Q. Who would keep those documents?

12 A. I would have to go look and see if there  
13 is a document.

14 Q. All right. In your training as the  
15 environmental coordinator, has anybody talked  
16 about keeping records of visits by environmental  
17 regulators?

18 A. It is captured sometimes like this one.  
19 I have the records; it is right there. So that is  
20 how I make the note. That night, I don't know if  
21 Tom or whoever did the first report. I don't know  
22 if there was a first report done. I would have to  
23 go look. I don't know.

24 Q. Okay. I mean, I guess I'm talking about  
25 a document reflecting the meeting with DEQ, not so



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 much the gas leak?

2 A. Well, you mean the actual discussion that  
3 we had with the DEQ? They usually would leave you  
4 something that they visited.

5 Q. And you don't have anything like that?

6 A. Not aware of one. These are the two that  
7 I can find or whatever I have here today.

8 Q. And you said "when we met with them."  
9 You didn't meet with DEQ between December 2011 and  
10 May 2012, right?

11 A. Go back to -- what did I say about "we"?

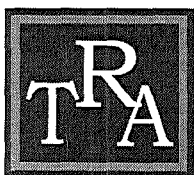
12 Q. Yeah, you said "when we met with DEQ,"  
13 and we are talking about this visit that you think  
14 occurred between December 2011 and May 2012. When  
15 you say "we met with them," that wasn't you  
16 meeting with DEQ?

17 A. No. When I use the term "we," I think  
18 I'm referring to the site.

19 Q. And I thought, too. I'm just clarifying  
20 for the record.

21 As far as you know, there is no  
22 document that said Tom Miller met with DEQ folks  
23 or Teddy Monconduit met with DEQ folks on whatever  
24 day?

25 A. Not that I'm aware of.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Has anybody taught you that you are  
2 supposed to document those kinds of meetings?

3 A. Typically, those are -- when I get them,  
4 I keep these. That is the documentation and there  
5 is the documentation, I think, that would be the  
6 logbook where somebody made that initial call. I  
7 would think it would have been the first place  
8 they would have put it, just as an operator. And  
9 that would have been noted there. The logbook  
10 does not go anywhere.

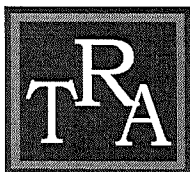
11 After that, I don't know if Tom  
12 keeps a file, you know, if he would have made that  
13 contact. He may.

14 Q. Okay. Is the -- are the environmental  
15 meetings with DEQ supposed to be maintained in the  
16 logbook, or is that just the only place the  
17 operator has to write it?

18 A. That would be his spot that he could put  
19 it.

20 Q. And then you would think that somebody  
21 else at the site would document it in a more  
22 formal --

23 A. We don't have a file. I have a file with  
24 these types of documents. If they leave this,  
25 which is usually a yellow sheet if they leave



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 this, then we have a formal file.

2 Q. Okay. If DEQ doesn't leave a form, then  
3 nobody at Dupont --

4 A. They would know about it --

5 Q. Wait, let me finish.

6 A. Excuse me. I'm sorry.

7 Q. If DEQ doesn't leave a form then nobody  
8 -- and nobody at Dupont, other than maybe an  
9 operator who writes it in a logbook, is going to  
10 make an official document regarding that visit; is  
11 that right?

12 A. There may be somebody like Tom that has  
13 done it. I don't know.

14 Q. Okay.

15 A. They may do that.

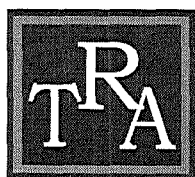
16 Q. All right.

17 A. And they may communicate that to somebody  
18 that does.

19 Q. But you don't -- it is not part of your  
20 area?

21 A. No. Not that particular moment. Now, if  
22 some -- today, if somebody shows up and I get this  
23 document, then I have it.

24 Q. Okay. Today, if DEQ comes out and they  
25 don't leave a form, are you supposed to create a



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 form that says they were there and what they did?

2 A. No.

3 Q. Okay. Other than that one conversation  
4 or visit that you think DEQ made to the site  
5 sometime between December 2011 and May 2012, do  
6 you know of any other communication with DEQ other  
7 than these two visits that are documented here in  
8 the documents produced today about the gas leaks?

9 A. I'm trying to think. No. Not really. I  
10 don't know.

11 Q. Okay. And I said about the gas leaks. I  
12 guess, let me retract that.

13 How many times are you aware that  
14 DEQ has ever come to the site, Burnside site?

15 MS. WEINER:

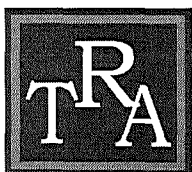
16 Ever?

17 BY MS. BARNEY:

18 Q. That he's aware of.

19 A. I think I'm aware of that one visit at  
20 some time frame. I never zoned in. I'm aware  
21 when they come and ask for me because there is  
22 usually some piece of paper that goes with it that  
23 they made this visit. Other than that, that would  
24 be how I would know.

25 Q. Okay. So the only ones that you are



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 aware of are hearing about this visit during the  
2 night, one night by DEQ, and you are not sure  
3 whether they were shown the hoses or not?

4 A. I'm not familiar with that, no.

5 Q. And then the September 2013 visit that we  
6 talked about a little while ago?

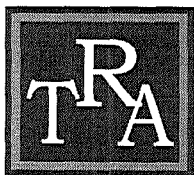
7 A. I do -- I'm aware of that one because  
8 they asked for me.

9 Q. And I think you have a document referring  
10 to a November 8, 2013 visit?

11 A. Yes.

12 Q. Other than those three visits by DEQ, are  
13 you aware of any other visits by DEQ to the  
14 Burnside site?

15 A. They came one day and they didn't -- he  
16 was talking about storm-water prevention. He was  
17 a water guy. The only reason I remember him being  
18 there is because that is the day Williams blew up,  
19 our neighbor blew up, but it happened that day,  
20 and I asked him, "Shouldn't you be over there?"  
21 That was just a question I asked him. He said,  
22 "No, we got enough people over there." And he  
23 stayed at our place for a while. I don't think he  
24 wanted to go over there and he stayed and that was  
25 a storm-water guy.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. About when was that?

2 A. That was when Williams blew up. That was  
3 in June sometime. I can't give you a specific  
4 day, but it was in June.

5 Q. Of 2013?

6 A. Yeah. Of this year. We also had DEQ  
7 show up and they did what they call a PSM audit.  
8 It was unannounced. And this is a totally  
9 different group of people that come and do this  
10 and they showed up and they did a PSM audit for  
11 like -- I think it was three days maybe. Could  
12 have been four.

13 Q. And about when was that?

14 A. That was March or April. I would have to  
15 go look at my records.

16 Q. That is of 2013?

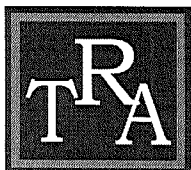
17 A. Yes. This year.

18 Q. And what is a PSM audit?

19 A. Process safety management.

20 Q. And did you meet with them during that  
21 audit?

22 A. I was on the initial visit and then they  
23 give you -- they request what they are going to  
24 talk about. And then other folks came in for the  
25 actual participation in the audit depending on



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 what they wanted to talk about.

2 Q. Okay. And what did they want to talk  
3 about?

4 A. There is like 14 spokes to a PSM and they  
5 can talk about all of them: Training, MOCP,  
6 technical, maintenance; it is a list. And we  
7 brought in some folks. We called in a PSM guy  
8 that is an expert. We called him in and I think  
9 he came the next day.

10 Q. So this is a Dupont person?

11 A. Yes. That was a DuPonter.

12 Q. PCM --

13 A. PSM.

14 Q. PSM expert?

15 A. Yeah.

16 Q. And so he was called in to meet with the  
17 DEQ?

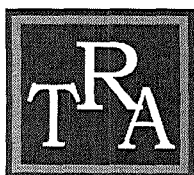
18 A. Yes. He was. Because it was geared  
19 towards process safety management. It was their  
20 audit.

21 Q. When you say "their audit"?

22 A. It was --

23 Q. DEQ's?

24 A. It was their department, whatever  
25 department that is that does this, it was the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 definition of the audit. And so that was defined  
2 as a PSM audit so, therefore, be brought a PSM  
3 individual in.

4 Q. Okay. Who came for that? Who was the  
5 DuPont PSM --

6 A. Larry Howard.

7 Q. And where does he work from?

8 A. He is at the Borderland plant in El Paso,  
9 Texas.

10 Q. About when did that audit take place?

11 A. First part of the year.

12 Q. Of January -- I mean, of 2013?

13 A. From January to June at some point. I  
14 would have to go look at my records.

15 Q. Do you recall if anybody from the  
16 Burnside plant participated in that audit with  
17 DEQ?

18 A. The PSM.

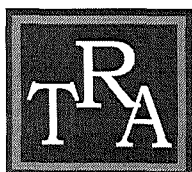
19 Q. I think you said it was March or  
20 April 2013; is that right?

21 A. Yes. That -- I'm throwing a date out  
22 there.

23 Q. You are not really sure?

24 A. I would have to go look.

25 Q. Okay.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. I know it is the first part of the year  
2 we call it.

3           Q. So let me back up.

4                       Who attended the initial visit  
5 besides you?

6           A. Okay. The initial visit, when they are  
7 coming for those, Tom was there. There was an  
8 opening session. Tom came in; I think a  
9 production supervisor, which would have been  
10 Elizabeth; the maintenance supervisor would have  
11 been in there. Some of the questions they were  
12 talking about was mechanical integrity and MIQA,  
13 which would have been the quality program. Those  
14 guys, which would have been Vandall Sturgen. And  
15 then let's see, those types of people were called  
16 in. I think that was it.

17          Q. Okay. Did --

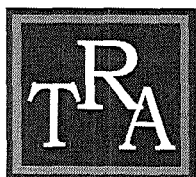
18          A. Gary Simpson, excuse me, he is MIQA.  
19 Gary Simpson.

20          Q. And I think you said that at the initial  
21 visit the DEQ says what they want to talk about?

22          A. Yes.

23          Q. And that decides who comes in?

24          A. On a PSM, it pretty well said what they  
25 were talking --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. What is that?

2 A. Process safety management.

3 Q. What does that mean to you?

4 A. Process safety management is an overall  
5 management system of the disciplines or protocols  
6 for operating safety from training, manuals, what  
7 we call management of change, PSSRs, MOC -- that  
8 would be management of personnel -- MIQA,  
9 contractors, mechanical integrity, it is just --  
10 I'm trying to think of anything -- emergency  
11 response, there is a list, but that is pretty much  
12 nailing it down. It is like 14 different things  
13 they look at.

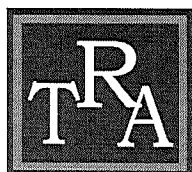
14 Q. Was this mainly a paper audit, or was it  
15 a field audit?

16 A. It's both. This gentleman came in with  
17 two other people, so they sort of divide and  
18 conquer.

19 Q. Do you know who those people were? I  
20 don't think we have any documents.

21 MS. WEINER:

22 Because when I asked him to search  
23 for those, I stated anything from the HIP and the  
24 CIP, which this does not have anything to do with,  
25 so that is why those documents have not been



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 produced.

2 BY MS. BARNEY:

3 Q. So there was no -- the audit did not  
4 pertain at all to the process, safety of the  
5 process area at the DuPont Burnside site?

6 A. They rarely -- when they go to those,  
7 they look at management systems: What you have in  
8 place, how you are following up on maintenance,  
9 your MIQA for welding, those type of things, your  
10 shops, operating procedures, those type of things.

11 Q. Okay. I thought earlier you testified  
12 that there was a maintenance problem with the HIP  
13 and the CIP and the converter --

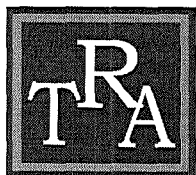
14 A. They don't get that detailed. They don't  
15 get into actual mechanical problems because you  
16 got -- they don't go look at the mechanic book to  
17 talk about everything that breaks.

18 Q. Okay. And I guess that is why I was  
19 trying to understand if it was a paper audit or  
20 field audit? You said it was both.

21 A. Yeah. It was a combination of the two.

22 Q. So nobody from the Dupont Burnside site  
23 said, "By the way, we have this maintenance  
24 problem" --

25 A. I'm not sure.



1 Q. Let me finish my question. We keep doing  
2 that and I hate to correct you, but the record  
3 will be a mess.

4 A. Okay.

5 Q. So nobody from DuPont told these people  
6 who were conducting the audit, "Look, we have a  
7 problem: We have leaks on the HIP, the CIP, the  
8 converter, super heater, ductwork, plenum; we  
9 can't get them under control"?

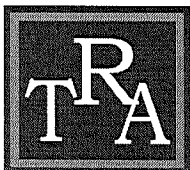
10 A. I don't know what they talked about  
11 because I wasn't in the meetings and I don't even  
12 think the final report has been sent back to the  
13 site yet from this meeting -- from this visit.

14 Q. I thought -- well, my understanding was  
15 that you had been asked to search for documents  
16 that had to do with leaks from the HIP and the  
17 CIP, and you thought these documents had nothing  
18 to do with leaks from the HIP and the CIP, these  
19 audit documents; is that right?

20 MS. WEINER:

21 No. I'm going to object to that  
22 because, first of all, my communications with him  
23 about what I have asked him to search for are  
24 privileged.

25 MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Right. I was going on what you  
2 just said.

3 MS. WEINER:

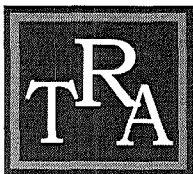
4 What I'll tell you is what I've  
5 asked him to do is search your files, because of  
6 the meet and confer that we had, for any  
7 documentation from the LDEQ or any regulatory  
8 agencies that have come on-site and if there has  
9 been any correspondence about leaks from the HIP  
10 and the CIP, anything to do with that. So that is  
11 why these documents are here. So anything that  
12 falls outside of that parameter, I didn't ask him  
13 to look for.

14 BY MS. BARNEY:

15 Q. Okay. So this audit, we don't have those  
16 documents for the audit?

17 A. No. I was trying to air out honestly  
18 what happened. They showed up from DEQ and they  
19 just showed up.

20 Q. So the documents, the audit that DEQ did  
21 in the first half of 2013 on the process safety  
22 management at Dupont Burnside, did not speak to  
23 the leaks on the HIP, the CIP, the converter, the  
24 super heater, the ductwork, or plenums, in that  
25 area, right?



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. Not that I know of.

2 Q. So that would mean that when the auditors  
3 came out, they didn't have on their list wanting  
4 to see the vessels that were involved in the  
5 operation or wanting to inspect those vessels,  
6 right?

7 MS. WEINER:

8 Object to the form to the extent  
9 that it calls for speculation.

10 BY MS. BARNEY:

11 Q. Okay. I guess what you are saying is the  
12 auditors didn't ask if there were any leaks from  
13 the vessels; is that right?

14 A. No.

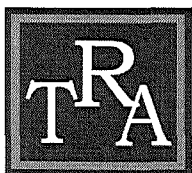
15 Q. And nobody at Dupont said, "By the way,  
16 we have leaks from our HIP or CIP and converter"?

17 A. I don't know what everybody said at that  
18 moment because the audit was sort of done in  
19 separate pieces. I don't know what other people  
20 may have said.

21 Q. And you have listed the people that met  
22 with the auditors?

23 A. I think I have given you all those folks,  
24 yes.

25 Q. So somebody was documenting what was



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 talked about in these meetings?

2 MS. WEINER:

3 Objection. It assumes facts not in  
4 evidence.

5 Is that your question, whether  
6 there were documents --

7 BY MS. BARNEY:

8 Q. I think -- you said, "We are waiting on a  
9 final report," and so was somebody documenting  
10 what was discussed in these meetings?

11 A. The people of the DEQ was.

12 Q. And as far as you know, nobody talked  
13 about the leaks from the HIP and the CIP or else  
14 we would have those documents?

15 MS. WEINER:

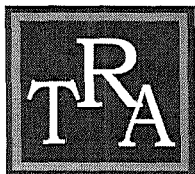
16 Objection. Asked and answered  
17 about a 100 times.

18 MS. BARNEY:

19 Okay. I don't know the answer --

20 MS. WEINER:

21 He has told you he doesn't have the  
22 final document and he has told you he wasn't in  
23 every single meeting. So your question as to  
24 nobody every asked him, he's answered that,  
25 because it would appear in the document. He



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 doesn't have the document. He's already told you  
2 that. They haven't gotten the final report yet.

3 BY MS. BARNEY:

4 Q. Are there pieces of paper pertaining to  
5 this audit other than the final report?

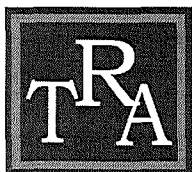
6 A. Not that I know of.

7 Q. So nobody documented that DEQ came out to  
8 do a PSM audit of the Dupont Burnside site; there  
9 are no e-mails; there is no paper trail?

10 A. As far as there is e-mails and there are  
11 people who -- whatever -- I don't know exactly  
12 what everybody had to do. I can only answer for  
13 what I had to do. My e-mail trail, or what I've  
14 talked about or what I was audited on, I just know  
15 that we know that they were there. There was no  
16 follow-up documentation on my portion of it. The  
17 mechanical, the other 13 or whatever spokes to the  
18 wheel, I think they are waiting on the report.

19 Q. Okay. So at -- something -- let me back  
20 up.

21 Something made you reach the  
22 conclusion that the e-mails, or whatever paper  
23 there is that pertains to this audit, did not fall  
24 into the category of paper that had anything to do  
25 with the HIP and the CIP and the converter leaks?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

**225.751.0732**

**225.752.7308 FAX**

**New Orleans, LA**

**504.392.4791**

**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 MS. WEINER:

2 I'll object. Because that is not  
3 even what I asked him to look for, and we are not  
4 going to get any further into that. I told you  
5 exactly. I said from the LDEQ, regulatory, you  
6 know, your file that you have on that -- because I  
7 know at the plant, they have those files. I asked  
8 him to search for that so there wouldn't be issues  
9 down the line of did you have these or not.

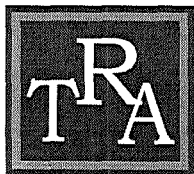
10 BY MS. BARNEY:

11 Q. I'm going to ask you. Do you know  
12 whether the paper trail -- do you have any reason  
13 to believe that the paper trail that pertains to  
14 the audit that the DEQ did on process safety has  
15 anything to -- has any relevance or any  
16 involvement with the HIP and the CIP and the  
17 converter leaks?

18 A. As far as I know, there is no  
19 involvement. There is no paper trail that  
20 specifically mentions any of those vessels that I  
21 know of.

22 Q. And as far as you know, nobody at DuPont  
23 told the auditors that there were leaks in the HIP  
24 and the CIP or the converter; is that right?

25 MS. WEINER:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1                   Objection. Asked and answered.

2                   You can go ahead and answer it

3 again.

4                   THE WITNESS:

5                   All I know is what I told them that  
6 particular day for the information they requested  
7 from me.

8 BY MS. BARNEY:

9                   Q. So as far as you know, nobody told them  
10 at DuPont about the leaks in the HIP, the CIP, the  
11 converter, super heater or the ductwork and  
12 plenums leading to those, right?

13                   MS. WEINER:

14                   Objection. Asked and answered.

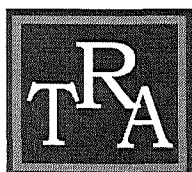
15                   You can go ahead and tell her  
16 again.

17                   THE WITNESS:

18                   As far as I know, what I talked  
19 about is what I understand. As far as anybody  
20 else mentioning any of those type of things, I'm  
21 not aware of it.

22 BY MS. BARNEY:

23                   Q. Okay. So nobody has come to you and  
24 said, "I told them about the HIP and the CIP and  
25 the converter leaks, so you don't have to," right;



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 that didn't happen?

2 A. I don't think anybody came to me about  
3 those statements.

4 Q. What did you talk to the DEQ auditors  
5 about?

6 A. We talked about procedures, training  
7 records. That was it that day.

8 Q. Okay. And what types of procedures?

9 A. It was operating procedures. Standard  
10 operating procedures.

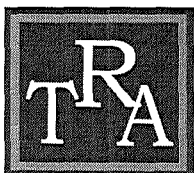
11 Q. Did any of those operating procedures  
12 include maintenance on the hoses and the vacuum  
13 system and the metal boxes that KBR has been doing  
14 on the gas leaks?

15 A. No.

16 Q. Do you know what training records they  
17 looked at?

18 A. They went in to look at what we call job  
19 cycle checks. JCC is what we call them. They  
20 basically want to know if there is a system that  
21 we keep up with those. I opened a file drawer,  
22 there they are, I took one out. I don't remember  
23 whose file I grabbed. I showed it to them, this  
24 is what we do. Put them back in, and that was it.

25 Q. Did any of the procedures or training



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 records that they looked at pertain to reporting  
2 environmental issues?

3 A. That day, it did not. I don't even know  
4 what procedure I handed them.

5 Q. Okay.

6 A. Excuse me, I don't even know what job  
7 cycle check. I just reached in and grabbed it. I  
8 don't know whose person's file it came out of.

9 Q. And beyond the job cycle check, what I'm  
10 talking about is: Did any of the procedures or  
11 records that they looked at that day have anything  
12 to do with reporting environmental problems?

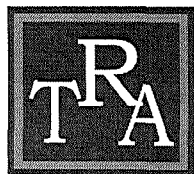
13 A. They were not specific about any type of  
14 procedure.

15 Q. Okay. So they looked at all of the  
16 procedures?

17 A. No. They asked if there was a management  
18 system for procedures. And I answered yes, there  
19 is. They asked if there is a review of those  
20 procedures, those type of questions, which is part  
21 of what we have to show them. There was no  
22 specific procedure asked for.

23 Q. Okay. Which ones did you show them? Do  
24 you know?

25 A. I don't know.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. If somebody --

2 A. I don't grab a procedure because it is a  
3 my favorite one. I don't deal with people that  
4 way. If there is a file, I grab a file. And I  
5 couldn't tell you which file I grabbed. I showed  
6 them the procedure and they looked at it and said  
7 okay and that was it.

8 Q. Okay. And so I guess what I'm thinking  
9 is: If you were asked what procedure, you said do  
10 you have a management?

11 A. They call it the management system.

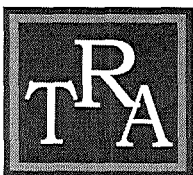
12 Q. What document is that, if somebody asks  
13 you for your management system of operating  
14 procedures?

15 A. Well, a system is the way you handle --  
16 what you handle. Do you have something in place  
17 that tells you that this is what you are supposed  
18 to be doing and how you keep up with it.

19 Q. Okay.

20 A. I'm not defining them -- I'm not saying I  
21 have the A, B, C procedure sitting here, this is  
22 what I do with it. I just have a group of  
23 procedures I have to keep up with. I have to know  
24 the frequency that they need to be looked at.

25 Q. All right.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732

225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. Those type of things.

2 Q. And which documents are those, is what  
3 I'm trying to understand?

4 A. The ones I showed them?

5 Q. Yes.

6 A. I couldn't tell you. Because I just  
7 grabbed a document. I have a stack of them. It  
8 is the operating procedures. I have a stack of  
9 them. I just grabbed one and handed it to them.

10 Q. Okay. Do those documents have any kind  
11 of reference numbers like maybe the ones that are  
12 listed on Exhibit 1?

13 A. No.

14 Q. So you didn't show them any standards?

15 A. No, no. None of those standards. That  
16 is corporate stuff.

17 Q. So you were looking at what category of  
18 documents? How would we know what --

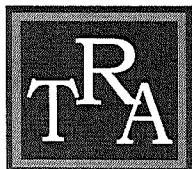
19 A. I couldn't tell you.

20 Q. Burnside safety manuals?

21 A. No. It is operating procedures.

22 Q. And where are those kept?

23 A. Those are kept -- right now, they are --  
24 there is -- right now, they are on the intranet.  
25 The guys have access to them. They click on the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 procedure and there it is.

2 Q. Okay. And so you don't think you showed  
3 them anything that had anything to do with  
4 environmental reporting issues?

5 A. No.

6 Q. Wasn't Ivy Albarez the MIQA person?

7 A. Ivy Albarez is the maintenance guy who  
8 has taken the extra training to become a pipe -- a  
9 field inspector kind of guy that can scratch and  
10 get the thickness of piping. The MIQA guys that  
11 keep those records, as far as coordinating efforts  
12 to make sure things are done, is I think Gary  
13 Simpson now. Ivy does the testing portion. The  
14 actual testing portion Ivy keeps up with.

15 Q. Where does Gary Simpson work out of?

16 A. He works out of the Dupont site.

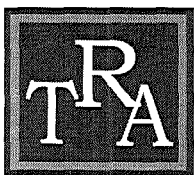
17 Q. At Burnside?

18 A. Yes.

19 Q. Did he give the auditors any documents  
20 pertaining to the thickness testing on the HIP,  
21 the CIP, or the converter?

22 A. I don't know what he gave them. I don't  
23 know if he gave them anything or not. They may  
24 have just talked.

25 Q. Are you aware of records pertaining to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 thickness testing on the HIP, the CIP, or the  
2 converter?

3 A. There is thickness testing that is done  
4 on just about every vessel out there, so I'm sure  
5 there is thickness testing on those vessels.

6 Q. Okay. Do you know how often that testing  
7 is done?

8 A. No, I do not.

9 Q. And do you know where those documents are  
10 kept?

11 A. No. I would have to ask Ivy. I don't go  
12 digging through maintenance stuff.

13 Q. So as the environmental person, nobody  
14 has brought you any thickness testing results on  
15 the vessels that are leaking?

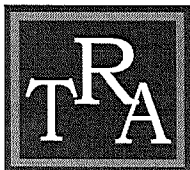
16 A. I have not seen that. No.

17 Q. Is that information maintained on the  
18 computer?

19 A. I think Ivy has that. I think he has a  
20 program that he compiles that.

21 Q. And it is called UltraPIPE; is that the  
22 name of it?

23 A. It could be UltraPIPE. It may have a new  
24 name now. I don't know it. I would have to get  
25 with him because I don't go looking for that



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 stuff.

2 Q. Okay. Do you think that that is not  
3 relevant to the gas leaks at the site?

4 A. In what respect?

5 Q. Do you not believe that the thickness of  
6 the vessel walls on the vessels that are leaking  
7 is not relevant to the environmental job that you  
8 have?

9 A. I don't go looking at that data. The  
10 thickness of a vessel, I couldn't tell you what it  
11 means.

12 Q. Okay.

13 A. And I doubt there is anybody else out  
14 there that can tell you, maybe other than an  
15 engineer type.

16 Q. Okay.

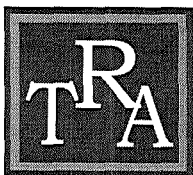
17 A. But I don't compare thickness of this  
18 vessel to whatever is in this vessel. I don't do  
19 that. There is nothing that I do that pertains to  
20 any of that type of activity.

21 Q. Okay. Does anybody that you know of do  
22 that for the Dupont Burnside site?

23 A. What?

24 Q. Keep track of the vessel thickness.

25 A. No. They keep track of it for frequency



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 of the testing, that would be Ivy and maybe the  
2 mechanical-integrity people. They keep those  
3 records so they'll know when the next time is for  
4 testing. Those type of things. They keep those  
5 records.

6 Q. Is it your understanding that those  
7 records pertain in any way to health, safety, or  
8 the environment?

9 A. Those records are not designated as  
10 health-safety-environment records.

11 Q. Okay. I'm asking you whether they bear  
12 upon the health, safety, and environmental  
13 situation at Dupont Burnside.

14 A. The records themselves?

15 Q. What the records reflect.

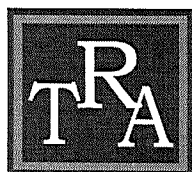
16 A. The records reflect that testing took  
17 place, which is part of that system.

18 Q. Okay. So do you think they are relevant  
19 to the safety, health, and environment to the site  
20 or not?

21 A. Eventually.

22 Q. And how's that?

23 A. The testing portion would be talking  
24 about thickness of pipe. That gives you a concept  
25 of when -- okay, when does it need to be replaced,



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 or I don't know about the failure mode, because I  
2 don't know about failure modes. And it is geared  
3 toward making sure the integrity of the piping of  
4 the vessels are intact and taken care of.

5 Q. We know that the integrity of the CIP,  
6 the HIP, the converter is not intact, right?

7 A. We have been repairing those.

8 Q. And so yes; the answer is yes, we know  
9 that they are not --

10 A. We have been repairing those vessels.

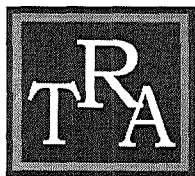
11 Q. Well, up until the shutdown in late  
12 September, early October, you knew that the  
13 integrity of the CIP, the HIP, and the converter  
14 were not intact; is that right?

15 A. The integrity? I know that they were --  
16 they were having mechanical issues. I know we  
17 were taking every means that we could necessary to  
18 make sure that we kept those vessels as well as we  
19 could, either by shutdowns or maintenance.

20 Q. And that is what somebody told you, or  
21 you personally made sure that happened?

22 A. Oh, I don't make sure anything personally  
23 happens out there.

24 Q. So how did you come to the understanding  
25 that DuPont was doing everything they could to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 protect against the -- I don't even know what you  
2 just said.

3 Dupont was doing everything they  
4 could to repair the problems with those vessels?

5 A. They were making cognitive efforts to  
6 make sure there was maintenance performed on those  
7 vessels. It was being done. It was being -- we  
8 shut the plant down when necessary to try to do  
9 what we needed to do to repair or anything,  
10 anything that is broken, we eventually take care  
11 of. So that is part of the way we run our  
12 business.

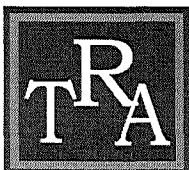
13 Q. Okay. The equipment: The HIP, the CIP,  
14 and the converter were leaking from December 2011  
15 until the shutdown in late September 2013, right?  
16 We've already covered that?

17 A. Yeah, I think that is understood.

18 Q. So there was no cold shutdown in between  
19 those two dates, right?

20 A. I don't know. I would have to go look at  
21 cold shutdowns. Not that I'm aware of, a cold  
22 shutdown.

23 Q. And it takes a cold shutdown to go in and  
24 see how many cracks and holes you have in a HIP, a  
25 CIP, and a converter; is that right?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. I don't know if it takes a cold shutdown  
2 or not. I know there is discovery work in every  
3 shutdown.

4           Q. So you just don't know?

5           A. There is discovery work in every  
6 shutdown. They may discover more than they  
7 anticipate or less.

8           Q. But you don't know whether it takes a  
9 cold shutdown in order to discover all the holes  
10 and cracks in the HIP, the CIP, or the converter;  
11 is that right?

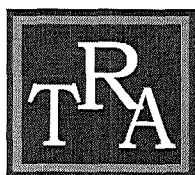
12          A. There are the obvious locations of where  
13 the leak could be. There is an understanding to  
14 go in and specifically pick out a crack or  
15 somebody to go in there, yes, it has to be cold  
16 because you cannot do that any other way.

17          Q. That's fair.

18                   My question was: If you wanted to  
19 get all of them, if you wanted to know about all  
20 the holes and cracks, you would have to do a cold  
21 shutdown?

22          A. Well, yeah, because you can't -- there is  
23 no way you can guess. That is why we use the term  
24 "discovery."

25          Q. But there are ways that you can tell you



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 have a leak; you just don't know exactly where it  
2 is or where the hole is or where the crack is; is  
3 that right?

4 A. Yes. It is possible that way.

5 Q. Okay. Were you involved in any meetings  
6 leading up to this shutdown in September/October,  
7 regarding whether to shut down earlier than that?

8 A. No.

9 MS. WEINER:

10 If you are switching topics, is  
11 this a good place to stop?

12 MS. BARNEY:

13 Yeah. I didn't realize it was  
14 here. Sorry about that.

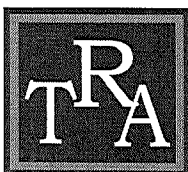
15 MS. WEINER:

16 That's okay.

17 (A lunch recess is taken.)

18 MS. BARNEY:

19 We were taking a little break from  
20 Mr. Ozbun's deposition and I just wanted to put on  
21 the record that Plaintiffs are producing to Ms.  
22 Weiner a copy of the October 31 police report that  
23 we didn't have yesterday at Jeff Simoneaux's  
24 deposition, but we talked about, and so I'm giving  
25 her a copy of that.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1                   And I also wanted to clarify and  
2                   have it documented on the record that there were  
3                   some discussions in Jeff's deposition about  
4                   October 27 and 28, and it looks like the 31st is  
5                   the date that may have been what Jeff was  
6                   referring to in some of his testimony, and so the  
7                   police report here is dated October 31st.

8                   MS. WEINER:

9                   Right.

10                  MS. BARNEY:

11                  If I recall, and I got your e-mail  
12                  during the lunch break, what I produced to you so  
13                  far, I thought, was video from October 27 and 28.

14                  MS. WEINER:

15                  Okay. I will check on 28.

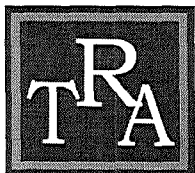
16                  MS. BARNEY:

17                  And there may be, I realize now,  
18                  after seeing the date on the police report, there  
19                  may be video from October 31st that I have not yet  
20                  even taken off of my camera and produced, so I  
21                  will work on that and see if it is there and get  
22                  it to you.

23                  MS. WEINER:

24                  Okay. Thank you.

25                  And -- I'll make a copy so you can



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 have this back.

2 MS. BARNEY:

3 Okay. And then as for telephone  
4 records, we'll get those, I'll look at them and I  
5 can give you the dates, October 27, 28, 31,  
6 whatever dates matter.

7 MS. WEINER:

8 That's fine. I did the e-mail  
9 while it was on my brain, but I didn't anticipate  
10 that you would have to deal with it immediately.

11 And then, this morning, with  
12 respect to Exhibit 1, the items that you had  
13 listed and you requested the different safety  
14 procedures, I misspoke and said that you have  
15 Dupont SHE protocol S1Z. It is actually S13Z that  
16 you have, this environmental deviation. It's  
17 DSF267 through 271, so that is the one you got.

18 MS. BARNEY:

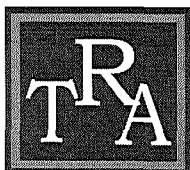
19 Yeah. That one sounds more  
20 familiar.

21 MS. WEINER:

22 I think that is all the clean-up  
23 issues that I have.

24 BY MS. BARNEY:

25 Q. Okay. Mr. Ozbun, are you aware of



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Mr. Leo Scott getting exposed to SO2/SO3 gas at  
2 the DuPont plant back in May of 2012?

3 A. Not specifically.

4 Q. Okay. At that point, you weren't in any  
5 environmental role, right?

6 A. No.

7 Q. You may have been in a safety and health  
8 role?

9 A. Yes.

10 Q. Do you recall that he had sought medical  
11 attention for what he realized was exposure?

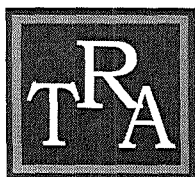
12 A. I know at some time frame, I know he had  
13 gone to medical, I think. But I didn't get into  
14 the specifics about it, because, typically, I  
15 don't get some of that information back because  
16 they start HIPPA conversations and those type of  
17 things. I don't -- I just don't get hung up on  
18 those a lot.

19 Q. Okay. In the safety role that you had  
20 after Ann Lafarrera left, were you the OSHA person  
21 at the site?

22 A. What do you mean "OSHA person"?

23 Q. The main person with OSHA responsibility  
24 at the Burn --

25 A. There are things I have to do, yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Was there anybody at Burnside, I guess,  
2 that would have OSHA responsibilities other than  
3 you, or were you kind of the OSHA-contact person?

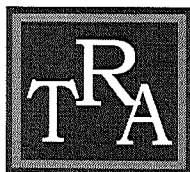
4 A. I talked to OSHA one time in my whole  
5 life. They -- I got the phone call.

6 Q. Tell me about that.

7 A. It was -- I think it might have been in  
8 the 2011 shutdown. I don't think it was 2009.  
9 There was a complaint from an individual. PPE --  
10 they were making him wear dirty PPE. I think it  
11 might have been a KBR guy that they called in. It  
12 wasn't any of the guys we are used to seeing. Due  
13 to the shutdown, they just start bringing in folks  
14 and he made the complaint of having to wear dirty  
15 PPE and he ended up calling OSHA. He did his own  
16 thing and called them. They followed up on it.  
17 Yeah. That's the only time I ever talked to them.

18 Q. All right. Is there any regular  
19 reporting or anything you have to do with OSHA as  
20 part of your job?

21 A. The one thing that I have to keep up with  
22 is what we call the OSHA 300 log, 300(A), which is  
23 -- you're designating any types of injury or  
24 illness that would have occurred that year. That  
25 has to be typically posted -- I think we start



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 posting that in February and it comes down in  
2 April, somewhere around there. And that is  
3 talking about specific injuries and those kind of  
4 things.

5 Q. So when you say "post it," what do you  
6 mean?

7 A. You actually put it out there for public  
8 consumption. You fill it out and you put it on  
9 the bulletin board.

10 Q. Okay.

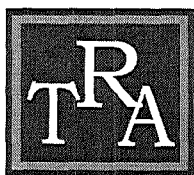
11 A. Everybody -- KBR has a guy that they have  
12 to do that. That is just one of the things that  
13 we have to do.

14 Q. So you had to do that for 2013 already?

15 A. I will eventually. Next year. You put  
16 the year before.

17 Q. Okay. So in 2013, you had to post for  
18 2012?

19 A. Yes. I went back. I would have to  
20 double-check it. I don't think I had anything up  
21 there, but I will double-check it. Yeah, you put  
22 the number of hours of exposure as far as being  
23 on-site, the term "exposure." You put the number  
24 of employees down. If there is a reportable  
25 injury or recordable injury, you put that down.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And then you post this on the bulletin  
2 board?

3 A. It is on the bulletin board. I think it  
4 is in the hallway.

5 Q. So there is one sitting there now?

6 A. No. It comes down in April.

7 Q. So it goes up in February and comes down  
8 in April?

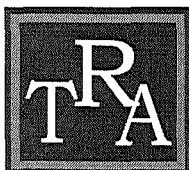
9 A. Yes.

10 Q. So there would have been one for 2012?

11 A. You have to keep those for like five  
12 years. So you go back five-year periods, you have  
13 to keep the log. You just have to keep it. That  
14 is what OSHA tells you to do.

15 Q. So the one that was posted in 2013 for  
16 the year 2012, what was on that posting?

17 A. I would have to go look. You know, there  
18 is nothing -- don't put a lot of things on those,  
19 but I would have to go -- I was trying to  
20 remember. I think we had a threshold shift and a  
21 hearing test. And so when there is a threshold  
22 shift, there is a certain amount of time that the  
23 employee goes back and has that test-run again, if  
24 he had gone to a concert or been hunting, that  
25 kind of thing. They do the test again. And it



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 was a non-event, but you put that on the log and  
2 you do what we call red-line it. Leave it there,  
3 you put a red line through it. It is not  
4 recordable.

5 Q. Is there anything on the 2012 log for gas  
6 exposure, like the Leo Scott deal?

7 A. I don't think so. No.

8 Q. Okay. So why would that not have been a  
9 reportable or recordable injury?

10 A. I would have to go look. What I get back  
11 is what the doctors would have given that would  
12 have eventually come to me, and it didn't come to  
13 me.

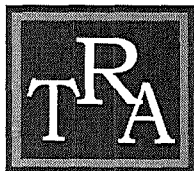
14 Q. So you didn't get anything from anybody  
15 else that would have put Leo Scott with a  
16 recordable injury for you to report on the OSHA  
17 log?

18 A. For the year 2012, I would have to go  
19 look. I don't think there is anything there with  
20 Leo's name on it, but I'll have to double-check.

21 Q. Do you recall -- if there is anything on  
22 the 2012 log that had to do with gas exposure, it  
23 would have been produced here; is that fair?

24 A. I would think so.

25 Q. Okay.



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. BARNEY:

Monique, do you know if there is  
anything?

MS. WEINER:

What was the question?

MS. BARNEY:

An OSHA log and an OSHA posting for  
2012.

MS. WEINER:

I honestly don't know.

MS. BARNEY:

Okay.

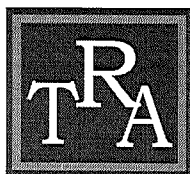
BY MS. BARNEY:

Q. So as far as you know, there is no gas  
exposure on an OSHA 2012 log?

A. No. As far as I know.

Q. And you are saying that is because nobody  
at Dupont told you anything about the Leo Scott  
gas exposure?

A. Typically, there is a period of days that  
you have to put something in there. It is like a  
seven-day window or something. If it is made  
known to me, I have that -- somebody pinches their  
finger or something at work, stitches or whatever,  
I have to put it on there within seven days. So I



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 would have known something within a seven-day  
2 period after the event took place or I was  
3 informed of it.

4 Q. You would have had to be informed within  
5 seven days --

6 A. Yeah. Seven days for me to put it on the  
7 log is what I'm saying.

8 Q. Somebody at DuPont or somebody is  
9 supposed to tell you an injury occurred and then  
10 you have seven days to get it on the log?

11 A. Yes.

12 Q. With regard to Leo Scott's contention  
13 that in May of 2012 he was exposed to gas at the  
14 site and went to the doctor, you don't have any  
15 information about that?

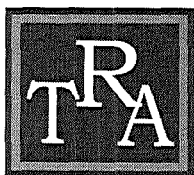
16 A. I do not recollect any information  
17 because there is nothing on the log. I would have  
18 to go double-check the log again.

19 MS. BARNEY:

20 And I guess we would just ask for a  
21 copy of the log after Mr. Ozbun checks it.

22 MS. WEINER:

23 I'll consider the request. I don't  
24 know what it has to do with the -- because Leo  
25 Scott has got his own lawsuit. I don't know



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 necessarily that -- there is a lot of  
2 cross-pollination going on. I don't know if it is  
3 relevant to the issues of this suit, but we can  
4 hash that out.

5 MS. BARNEY:

6 And I would contend that it is  
7 relevant in this suit.

8 BY MS. BARNEY:

9 Q. Other than -- so is my question about Leo  
10 Scott the first time you heard about the Leo Scott  
11 exposure issue?

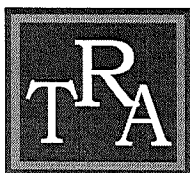
12 A. Leo was very obvious about what he was  
13 doing.

14 Q. And what is your understanding of what he  
15 was doing?

16 A. I was seeing him doing it. He was  
17 walking around with a respirator on for 24 hours.  
18 He wore a respirator probably to the bathroom, I  
19 don't know. He was wearing a respirator at times  
20 that I've never seen anybody wear one.

21 Q. Okay. And was that after he contended  
22 that he got exposed to gas at the plant?

23 A. I don't know if it was after, but I -- I  
24 don't know. But I do know he was wearing a  
25 respirator a lot.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. When is the first time you knew that he  
2 contended that he was exposed to gas at the plant?

3 A. Can't give you a date on that.

4 Q. Do you know if it was before or after you  
5 saw him wearing the PPE?

6 A. It had to be before because after the  
7 fact is when he started all of a sudden was  
8 wearing one every day, it look like, which was  
9 very odd.

10 Q. So you knew, before you saw him wearing  
11 PPE, you knew he had been contending that he was  
12 exposed to SO3 at the site?

13 MS. WEINER:

14 Object to the form. You said  
15 before, before he was wearing PPE?

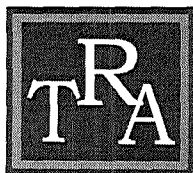
16 BY MS. BARNEY:

17 Q. Yeah. Before you saw him wearing PPE, as  
18 you've just described, you knew that he had  
19 claimed to have been exposed to SO3?

20 A. I think, yes.

21 Q. And how did you hear that?

22 A. Well, when somebody is walking around,  
23 you hear people talking. He never came to me  
24 personally to say that is why he is wearing it.  
25 Which I had -- he could have, if he wanted to, but



1 he never came to me and said, "This is why I'm  
2 doing this."

3 Q. After you heard that he had been exposed  
4 to -- claimed to have been exposed to gas at the  
5 site, did you go and talk to him about that from a  
6 safety-OSHA standpoint?

7 A. No.

8 Q. Any particular reason?

9 A. No.

10 Q. Have you heard of anyone else since  
11 December 2011 claiming that they went to the  
12 doctor because of gas exposure at the site?

13 A. No.

14 Q. You don't know of anybody?

15 A. I don't know of anybody, no, that went  
16 for gas exposure.

17 Q. Are you familiar with the windsock that  
18 is at the plant --

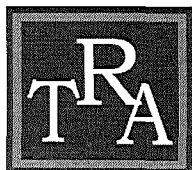
19 A. Yes, I am.

20 Q. -- at the top of the equipment?

21 A. Uh-huh.

22 Q. Do employees use that windsock to try and  
23 kind of stay upwind from gases as they walk around  
24 the plant?

25 A. I don't -- what do you mean, as far as



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 that is what they look at to make sure they don't  
2 walk into something?

3 Q. Right.

4 A. Not really. That windsock is basically  
5 told to people in case of something, you look at  
6 the windsock and go to the opposite direction,  
7 typically in an emergency situation. That is one  
8 of the things you look at.

9 Q. If there has been testimony in this case  
10 that employees watch the windsock and they try to  
11 stay on the upwind side of it, would you dispute  
12 that?

13 A. No.

14 Q. What is your understanding of SO3 in  
15 terms of its harmful effects?

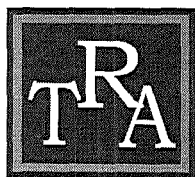
16 A. It is an inhalation hazard.

17 Q. Okay. Do you have -- have you been  
18 trained, or at any point, do you -- have you  
19 obtained knowledge about the hazards of SO3?

20 A. Yes.

21 Q. Okay. Did you have any reason not to  
22 believe what you heard about Leo Scott being  
23 exposed to SO3?

24 A. Are you saying that I thought he might  
25 have been telling a tale?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Yeah -- I don't know -- I guess I'm --  
2 something about the way you answered made me  
3 wonder. Did you have any doubt as to whether or  
4 not he was really exposed to SO3?

5 A. I had a question mark the way I answered  
6 because he was wearing this thing all the time.

7 Q. Okay.

8 A. That was my question mark. The behavior  
9 of wearing a face mask all day long is -- I had  
10 never seen before. That was -- that was what I  
11 was talking about with Leo. Now, I don't know,  
12 there is nothing for me to say that he is a liar.

13 Q. Okay.

14 A. I don't know -- I don't think he is,  
15 but...

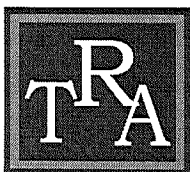
16 Q. Do you have any reason to believe that he  
17 was not exposed to SO3 gas at the site?

18 A. I don't have any belief he was or wasn't.  
19 Either-or.

20 Q. Did you do any investigation into that?

21 A. As a result of his report or hearing or  
22 seeing him with the face mask on at all times?

23 Q. As a result of anything; did you do an  
24 investigation into whether Leo Scott was exposed  
25 to SO3 at the site?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I did not.

2 Q. Do you know whether or not anybody did?

3 A. I don't know.

4 Q. Did you see Leo Scott wearing PPE all day  
5 long, a face shield all day long?

6 A. I saw Leo wearing -- it was a face piece,  
7 full face piece. I had seen him.

8 Q. For how long did you actually observe  
9 him?

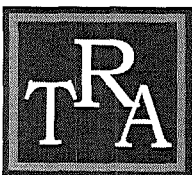
10 A. Driving by in a truck, sitting in a truck  
11 seat, riding with a face mask on.

12 Q. So total time, how long would you have  
13 observed that?

14 A. Anytime I saw him. It was anytime I saw  
15 Leo, which could have been a total of 20 minutes  
16 in one day or one minute in a one day for a while  
17 there. I didn't chase Leo down, but every time I  
18 seen Leo, he had a face piece on that day. And  
19 those guys, don't see them all day, every day, but  
20 I do remember that because it was rather odd.

21 Q. So you really don't know if he had it on  
22 all day or not; you just know that on the days  
23 that you saw him, he had a face shield on?

24 A. The days that I saw Leo, he was wearing a  
25 face shield sometimes when I had never seen



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 anybody do before.

2 Q. And that was, as you understand it, after  
3 he claimed to have been exposed to SO3 gas?

4 A. I'm guessing that is it. I'm assuming  
5 that is it because that is what he felt like he  
6 wanted to do.

7 Q. And that would have been late May 2012?

8 A. I don't know the timing with Leo.

9 Q. Okay. Getting back to just some  
10 questions about SO3. DuPont manufactures liquid  
11 sulfur trioxide at the site?

12 A. Yes.

13 Q. And sulfur trioxide gas is used in the  
14 production of those processes; is that right?

15 A. Say that one more time.

16 Q. Is sulfur trioxide gas used in the  
17 production of sulfuric acid/oleum?

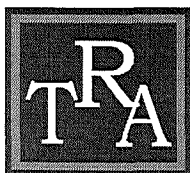
18 A. It is one of the stages, yes. Sulfur  
19 trioxide is included and part of what happens  
20 inside the plant to make sulfuric acid.

21 Q. Okay.

22 A. The gas form, yes.

23 Q. Would you agree that sulfur trioxide is a  
24 poisonous gas known to cause cancer in humans?

25 A. I know it is an inhalation hazard. I



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 know at one time it was called poison because of  
2 the poison placards, skull and crossbones. A  
3 placard still with skull and crossbones. It is a  
4 6.1 inhalation hazard. It is a Class A corrosive  
5 hazard. Yes, I know that. The cancer-causing  
6 piece of it, I know there was some information out  
7 by IARC. That was pretty common knowledge. I  
8 think it is on the MSDS and those type of things.

9 Q. And do you know whether SO3 is listed as  
10 a substance under the toxi -- hazardous substance  
11 under the Toxic Substances Control Act?

12 A. There is like 80,000 chemicals I think  
13 listed. I don't know -- I think it probably is.

14 Q. Okay. As part of your job in safety,  
15 health, and environment, do you keep an MSDS sheet  
16 for SO3?

17 A. I have access to them.

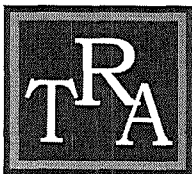
18 Q. And where do you have access?

19 A. Intranet.

20 (Whereupon, the document referred to is  
21 marked as Exhibit No. 3 for identification.)

22 BY MS. BARNEY:

23 Q. Okay. Let me just show you what is  
24 marked as Exhibit A to the complaint, but we'll  
25 make it as Exhibit 3 to your deposition and ask



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 you to take a look at that MSDS.

2 Would that be the kind of MSDS for  
3 sulfur trioxide that you might find on the  
4 internet?

5 A. No, this is not a Dupont MSDS.

6 Q. You were saying the intranet?

7 A. Intranet. You can go on the internet,  
8 too. This is the intranet simply because I go and  
9 get the DuPont version, which is pretty --

10 Q. All right.

11 A. -- this is the standard form for a MSDS,  
12 which is now called safety data sheets. They  
13 changed the name of it.

14 Q. Okay. As far as you understand, there is  
15 a DuPont version of an MSDS for SO3?

16 A. Yes.

17 MS. BARNEY:

18 I guess we just request that it be  
19 produced.

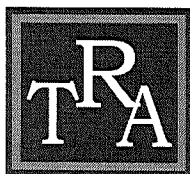
20 BY MS. BARNEY:

21 Q. Is there also one for SO2?

22 A. Yes, there is.

23 MS. BARNEY:

24 Okay. I guess I'll request a copy  
25 of that, too. I think it is covered by our formal



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 request, but we can deal with it if you don't  
2 think that is the case.

3 BY MS. BARNEY:

4 Q. So would you admit that sulfur trioxide  
5 is very hazardous in case of skin contact, eye  
6 contact, ingestion, inhalation?

7 A. Yes, I would.

8 Q. Would you agree that sulfur trioxide as  
9 liquid or sprayed may produce tissue damage  
10 particularly on mucous membranes, eyes, mouth,  
11 respiratory tract?

12 MS. WEINER:

13 I'll object to the extent that it  
14 calls for an expert opinion, and there is no  
15 quantification of any dosage in your --

16 MS. BARNEY:

17 That's correct.

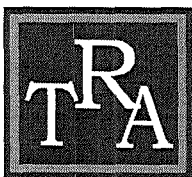
18 BY MS. BARNEY:

19 Q. So is that your understanding? If you  
20 need refer to the MSDS sheet --

21 A. I don't need to refer to it.

22 What was the question again?

23 Q. Whether we can look at the MSDS which is  
24 Exhibit 3. I believe it states under Section 3:  
25 Hazards identified. Very hazardous in case of



**TORRES REPORTING & ASSOCIATES, INC.**

**COURT REPORTING & LITIGATION SERVICES**

**tra@torresreporting.com**  
**www.torresreporting.com**

**Baton Rouge, LA**  
**225.751.0732**  
**225.752.7308 FAX**

**New Orleans, LA**  
**504.392.4791**  
**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 skin contact, eye contact, ingestion, or  
2 inhalation?

3 A. Yes.

4 Q. So you would agree with that?

5 A. Yes, I would.

6 Q. I just ask you to look at Exhibit 3, in  
7 light of the objection that was made, and tell me  
8 if you see anything in there about quantities that  
9 are mentioned on that MSDS?

10 A. What do you mean? What are you talking  
11 about, quantities?

12 Q. I think the objection was quantities of  
13 exposure. Is there anything on the MS --

14 MS. WEINER:

15 My objection was dose.

16 THE WITNESS:

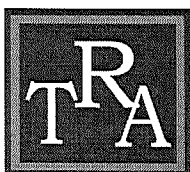
17 Oh, dosage. Typically, there is  
18 PPLs and AALs listed.

19 BY MS. BARNEY:

20 Q. But there is nothing in the MSDS that  
21 says it is only going to cause eye irritation or  
22 skin problems or inhalation problems at a certain  
23 dose, is there?

24 MS. WEINER:

25 So your question is specific to the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 MSDS that is not DuPont's, right?

2 MS. BARNEY:

3 I don't have DuPont's. They didn't  
4 produce it. So we're looking at Exhibit 3.

5 MS. WEINER:

6 I just want to make sure it is  
7 clear for the record that you are asking him for  
8 that information from the MSDS that is not  
9 Dupont's?

10 MS. BARNEY:

11 Right. I don't have Dupont's. Or  
12 from his personal knowledge of DuPont's MSDS.

13 THE WITNESS:

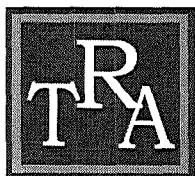
14 The toxicological information,  
15 which is not uncommon, is not available on this  
16 one. I'm looking at what is normally is on this.  
17 There is some dosages mentioned here in the  
18 special remarks on toxicity.

19 BY MS. BARNEY:

20 Q. And what does that say?

21 A. Special remarks on toxicity of animals.  
22 The lowest published lethal dose on a guinea pig  
23 by inhalation, three milligrams, in so many hours  
24 on that one.

25 Q. Do you see any other dose information?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. Not on this particular one. I'm just  
2 looking. Not really. That is the only place I  
3 see it.

4           Q. Okay. As far as you know, do you think  
5 that Dupont has generated an MSDS that says SO3 is  
6 not a skin contact unless you receive a certain  
7 dose? I'm sorry, a hazard to skin contact unless  
8 you receive a certain dose?

9           A. You are saying an amount that hit the  
10 skin would not cause damage, is that what we are  
11 saying, unless it was a certain --

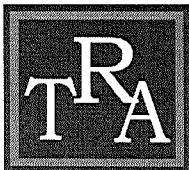
12          Q. Right. Does the MSDS that DuPont  
13 generated, assuming there is one, which we don't  
14 have right now, does it state under hazards that  
15 it is -- SO3 is only a hazard to eye contact at a  
16 certain dose? Or is only a hazard to skin contact  
17 at a certain dose?

18          A. Dosage compared to what you are talking  
19 about with actual contact with an eye or skin,  
20 there is no such thing as dosage.

21          Q. Okay.

22          A. It would be -- yeah, a drop, it is very  
23 corrosive. It is a corrosive liquid.

24          Q. Okay. So the MSDS that DuPont generated  
25 probably does not have any kind of dose like that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 from DuPont?

2 A. Not for skin contact.

3 Q. Or eye contact?

4 A. Or eye contact. A drop is a drop. A  
5 splash is a splash. It burns.

6 Q. Okay. And the same would be true to some  
7 sort of, like, throat injury or irritation?

8 A. I think theirs was -- some of the  
9 information on the dosage may have some bearing.

10 Q. On your throat?

11 A. It is possible.

12 Q. And do you know whether or not DuPont's  
13 MSDS would have any sort of dose information for  
14 throat irritation?

15 A. Dosage, I doubt it. I just don't know.

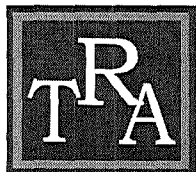
16 Q. Okay.

17 A. Those numbers are not in my head all the  
18 time.

19 Q. Okay. So you think that if a drop hits  
20 your eye, it doesn't -- a drop is a drop, but if  
21 it hits your throat, you think there may be a  
22 different analysis?

23 A. You mean internally if you swallow a  
24 drop?

25 Q. Yes, if it just hits the back of your



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 throat.

2 A. You are going to burn. A liquid -- you  
3 have a burn.

4 Q. Have you ever had your eyes burned or  
5 become irritated after being around the gas at the  
6 plant?

7 A. Not in a long, long time.

8 Q. Okay. But you kind of know that feeling,  
9 I guess; you understand that you're --

10 A. Yes. I do know the feeling.

11 Q. Okay. Did you ever go to the doctor  
12 because of such an exposure?

13 A. No, I have not.

14 Q. Is it your understanding that repeated or  
15 prolonged exposure to sulfur trioxide can produce  
16 target organ damage?

17 MS. WEINER:

18 Objection to the form.

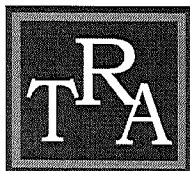
19 You can go ahead and answer.

20 THE WITNESS:

21 What was the question again?

22 BY MS. BARNEY:

23 Q. Just whether it is your understanding  
24 that repeated or prolonged exposure to sulfur  
25 trioxide can produce target organs damage?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. WEINER:

Is there a specific section on the  
MSDS you are looking at?

BY MS. BARNEY:

Q. I believe it is in there, but I guess my  
question is: Do you know, on your own, and if  
not, would you defer to whatever the MSDS says on  
that --

A. I'm familiar with the term "target  
organs."

Q. You are, okay.

A. Yes, I am.

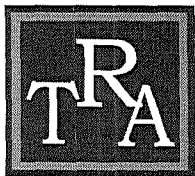
What else do you need to hear?

Q. Do you know whether or not SO3 repeated  
and -- or prolonged exposure to SO3 can produce  
target organs damage?

A. I would think so, prolonged.

Q. Okay. And do you have in your mind what  
"prolonged" means in that context?

A. I'm -- I don't think you are going to  
stand out there and stand in it every day. When I  
think of an exposure, of course, I think it is an  
event that happens immediately, at that moment  
there is an exposure. Standing over something and  
just constantly being bombarded by whatever it may



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 be, I don't have that concept of what that would  
2 be. I do understand immediate type of things.

3 Q. All right. Is it your understanding that  
4 sulfur trioxide has been proven to have  
5 carcinogenic effects in humans?

6 A. I think that has been reported, yes.

7 Q. Is it your understanding that precautions  
8 for the handling and storage of sulfur trioxide  
9 include keeping it away from incompatibles?

10 A. Yes. That is pretty normal.

11 Q. And such as oxidizing agents, metals,  
12 alkalis, and moisture?

13 A. Yes.

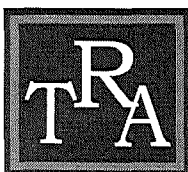
14 Q. It is your understanding that sulfur  
15 trioxide is moisture sensitive?

16 A. Yes.

17 Q. Is it true that personal protection  
18 recommended against exposure from sulfur trioxide  
19 includes the face shield, full suit,  
20 approved/certified vapor respirator, gloves, and  
21 boots?

22 A. Say that one more time.

23 Q. Personal protection recommended against  
24 exposure from sulfur trioxide includes face  
25 shield, full suit, approved/certified vapor



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 respirator, gloves, and boots?

2 A. Not -- yes. Not that terminology, but  
3 that sort of beats around the bush and gets to it.

4 Q. Tell me what it would be in your  
5 terminology.

6 A. Terminology for me, I don't call them  
7 face shields. I call them full-face respirators.  
8 I call them goggles, if necessary.

9 You said full-acid suit is what you  
10 said?

11 Q. Full suit?

12 A. Full-acid suit. That is the terminology  
13 that I'm used of hearing.

14 Q. So you would say full-face respirator,  
15 full-acid suit, approved/certified vapor  
16 respirator, or is that included in --

17 A. The full face would be that.

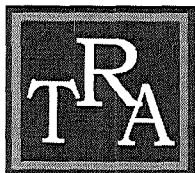
18 Q. So under your definition, it would be  
19 face shield, full-acid suit, full-face respirator,  
20 gloves, and boots?

21 A. No face shield.

22 Q. I'm sorry. I got it now. Full-acid  
23 suit, full-face respirator, gloves, and boots?

24 A. For sulfur trioxide?

25 Q. Yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. We actually go further than that.

2 Q. Okay. What --

3 A. It is a hood.

4 Q. A hood. Anything else?

5 A. You have your respirator you mentioned.

6 I call it a full-acid suit. Gloves, I don't know  
7 if we mentioned gloves. Did you say gloves?

8 Q. Yes.

9 A. And boots. That pretty well covers most  
10 of it. Pretty much your whole body would be  
11 protected.

12 Q. Okay. Would you agree that conditions of  
13 any instability for sulfur trioxide are moist air,  
14 water, and incompatible materials?

15 A. The term "instability," what do we mean  
16 by that?

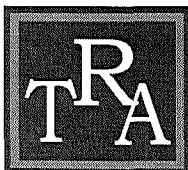
17 Q. I think you will find it on the MSDS  
18 sheet. There is probably a section on stability.

19 A. Okay. Yeah. You quoted what it says.

20 Q. Okay. So you would agree that conditions  
21 of instability for sulfur trioxide is moist air,  
22 water, and incompatible materials?

23 A. According to what this says, yes.

24 Q. And sulfur trioxide may undergo hazardous  
25 decomposition and condensation and may react



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 violently with water to emit toxic gases; would  
2 you agree with that?

3 A. That is a mouthful. Say that again.

4 Q. It is. I'll break it down. And I just  
5 want to know if you disagree.

6 A. I don't know. I do not disagree. I'm  
7 just looking.

8 Where are we reading that?

9 MS. WEINER:

10 Section 10, the third part down.

11 MS. BARNEY:

12 And I think we are on Exhibit 3.

13 THE WITNESS:

14 Yeah.

15 BY MS. BARNEY:

16 Q. Okay. So you would not dispute that?

17 A. No.

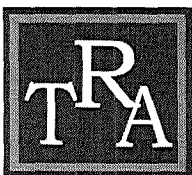
18 Q. Would you agree that sulfur trioxide  
19 rapidly absorbs moisture from the air emitting  
20 dense white fumes?

21 A. Yes.

22 Q. And sulfur trioxide may be absorbed  
23 through the skin; is that right?

24 A. Yes.

25 Q. I believe you said this earlier, but you



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 would agree that sulfur trioxide is a lung  
2 corrosive material?

3 A. It is an inhalation hazard is what it is  
4 called.

5 Q. And it may cause permanent damage to the  
6 digestive tract?

7 A. I don't know about all that. It may say  
8 that. I guess if you consume it, it probably  
9 would. I don't know how else it would get into  
10 the digestive tract.

11 Q. Is it your understanding that sulfur  
12 trioxide may cause irritation of the respiratory  
13 tract and mucous membrane with sore throat,  
14 coughing, shortness of breath?

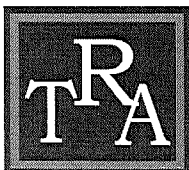
15 A. Yes. Yes.

16 Q. Is it true that inhalation of sulfur  
17 trioxide may be fatal as result of spasm,  
18 inflammation, edema of the larynx and bronchi,  
19 chemical pneumonitis, and pulmonary edema?

20 A. I don't know if this has ever happened,  
21 but I guess if a gross exposure, yes, probably  
22 would be.

23 Q. Okay. And I think you said earlier that  
24 sulfur trioxide is a poisonous material?

25 A. Inhalation hazard. It used to be called



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 a poison gas. That is not the terminology  
2 anymore. It is an inhalation hazard. The placard  
3 has a skull and crossbones. It is there.

4 Q. Are you familiar with a  
5 government-approved training session that DuPont  
6 did out of state, maybe near Nevada or somewhere?

7 A. Yes.

8 Q. Were you there?

9 A. I have been there.

10 Q. Did they actually spill some liquid SO3  
11 and see how far they can detect?

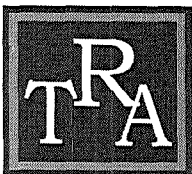
12 A. They spill -- what they spilled there is  
13 CSA, which is a chlorosulfonic acid. They spilled  
14 65 percent oleum. I'm not -- I don't think they  
15 spilled liquid sulfur trioxide. 65 percent oleum  
16 is as close you can get to sulfur trioxide. The  
17 cloud is the same.

18 Q. Okay.

19 A. It makes an ugly cloud either way. Yeah.

20 Q. And do you recall -- how much did you say  
21 they spilled?

22 A. It is a controlled spill. Typically,  
23 they bring those in totes. There is typically on  
24 -- there is a pipe that comes out of there and it  
25 measures out about a gallon or two into a basin



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 sink of some kind and that is when they do their  
2 mitigation practice so to speak.

3 Q. All right. Were you ever present when  
4 they did a test to see how far the SO3 gas  
5 traveled after the spill?

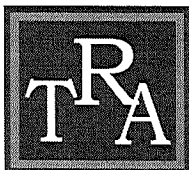
6 A. I don't know -- I was there for the  
7 training part about the mitigation piece. I don't  
8 know how far -- I don't even -- they may have a  
9 way of looking at how far that cloud -- it is a  
10 desert. It is where they test the nuclear bombs.  
11 It is always said that if it is a heavy-enough  
12 cloud, it will go a certain distance before you  
13 saw these mountains. I don't think I ever saw it  
14 from that far. I am not saying it hasn't.

15 Q. So if somebody said that it traveled  
16 eight miles, would you have any reason to dispute  
17 it?

18 A. If it was a heavy-enough cloud. It would  
19 have to be a pretty good cloud to travel that far,  
20 but I wouldn't dispute it.

21 Q. Okay. There are no monitors for SO3  
22 available at the site for someone just to grab and  
23 wear or hold up in a certain area of the plant on  
24 a given day?

25 A. No.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And has that been true since December of  
2 2011?

3 A. Yes.

4 Q. Have you been advised by anybody at  
5 DuPont that an employee asked for such a monitor  
6 or had gone looking for a monitor?

7 A. I don't know if there is such a monitor.

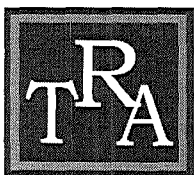
8 Q. Okay. Have you ever heard of a Draeger  
9 tube?

10 A. Yes. I know -- I'm aware of Draeger  
11 tubes.

12 Q. Tell me what that is.

13 A. A Draeger tube is two kinds. Typically,  
14 it is made in Germany. It is usually a tube so  
15 many inches long that has a filter media in it and  
16 it is a calibration or numbers on the side for  
17 lack -- like a thermometer, and there are grades  
18 of what that exposure may be. You break off both  
19 ends of it, put it in -- the old school Draeger  
20 tubes, you actually pumped them. You did so many  
21 pumps at a certain location to test whatever you  
22 were looking for. You can use Draeger tubes on a  
23 lot of things.

24 Then there is also now, I think  
25 there is a battery-operated one, also. That is



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1        what I know about Draeger tubes. Don't deal with  
2        them as much anymore, but it is probably -- it is  
3        an accepted method. They are still out there and  
4        people still try to sell them to you.

5            Q. So that is a method for detecting the  
6        presence of SO3?

7            A. You would not need that to detect it  
8        because you are going to see it.

9            Q. Okay. What if you wanted to detect it  
10       before you saw it --

11          A. I don't know.

12          Q. -- could you use the Draeger tube?

13          A. To -- I don't think you would detect it  
14       without seeing it because of the definitions we've  
15       used earlier. Because once it hits the  
16       atmosphere, there would be the formation that we  
17       are talking about of the cloud or the vapor.  
18       Vapor, whatever you want to call it.

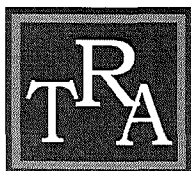
19          Q. Does the Draeger tube quantify the amount  
20       of SO3?

21          A. No.

22          Q. It just tells you that it is there?

23          A. It just tells you it is there.

24          Q. So, basically, the way that DuPont  
25       determines or tracks SO3 leaks at the Burnside



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 plant is based on visibility, just by seeing the  
2 gas?

3 A. For SO3, which there is not a lot of  
4 that, that would be the way you would do it.

5 Q. When you say "there is not a lot of  
6 that" --

7 A. Those things are very visible, you would  
8 take care of it at that moment.

9 Q. Well, they haven't been able to take care  
10 of it from December 2011 till the shutdown --

11 A. There is not an excessive amount of SO3  
12 that has been released at that area.

13 Q. At what area?

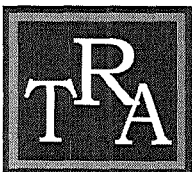
14 A. What area we are talking about.

15 Q. Well, how would you know if you don't  
16 know what area we're talking about?

17 A. Because I know what we are talking about,  
18 but there has not been any of those mentioned as  
19 far as numbers. What you are talking about, there  
20 would have been a big giant cloud that I know of  
21 that is left in my reports. I don't see that.

22 Q. When you say "that is left," what does  
23 that mean?

24 A. If there was a release, I don't have any  
25 reports of a cloud.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. You haven't seen -- so nobody has shown  
2 you the incident reports prepared by operators --  
3 if an operator creates an incident report about a  
4 gas cloud floating across the site, that's not  
5 shared with you?

6 A. Yes, I see those, but some of those I  
7 don't know at that point what they were talking  
8 about, as far as if it was SO3 or not. I don't  
9 see that many of them.

10 Q. Have you ever seen an incident report  
11 describing a gas cloud that said that it was SO3?

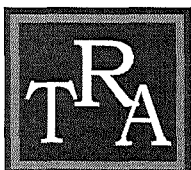
12 A. If it was a visible cloud, yes. I would  
13 have to go back and double-check and look, but I'm  
14 sure I have.

15 Q. So you are testifying that you don't  
16 think there is a lot of SO3 gas at the plant that  
17 is escaping because you haven't seen many reports  
18 about it?

19 A. No. I don't think there is a lot  
20 escaping because it would be something that we  
21 would all probably see. If I looked out there, I  
22 would see it.

23 Q. Isn't it easier to see the gas at night?

24 A. I don't know about all of that, if it is  
25 easier or not.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Okay. So you just don't know?

2 A. I don't know if it is easier to see. It  
3 depends on your eyesight, I guess.

4 Q. Do you work at night at the plant?

5 A. Not anymore.

6 Q. When is the last time you worked at  
7 night?

8 A. Last time I did some work out there, I  
9 was working, it was during a turnaround. I was  
10 the night person, I guess you would call it, and I  
11 worked nights during that time frame when the  
12 plant was down.

13 Q. What year was that?

14 A. Last time I worked nights and there was a  
15 shutdown might have been '07. Somewhere around  
16 there.

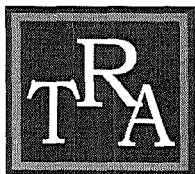
17 Q. Have you been at the Burnside plant after  
18 dark or before sunrise since December 2011?

19 A. Yes.

20 Q. How many times?

21 A. Every day. I usually get to work early  
22 in the morning. Most of the time, it is before  
23 sunrise.

24 Q. And you have never driven up to the plant  
25 and seen a gas leak coming out of the plant?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Not an SO3 leak.

2 Q. Well, SO2 is not visible, right?

3 A. It is not visible. I don't know if I  
4 have never seen an SO3 just taking off in the  
5 plant in the morning when I get there or I would  
6 be disturbed about that, but I have never seen  
7 that.

8 Q. So you have -- have you ever seen an SO3  
9 gas leak at Burnside plant since December 2011?

10 A. I've seen the -- some of the smaller  
11 leaks that were captured, maybe some of the hoses  
12 and that type of thing, but not a big cloud or  
13 anything like that. No, I have not.

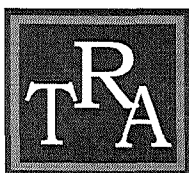
14 Q. But you are not saying that maybe others  
15 have seen that?

16 A. I don't know what others have seen.

17 Q. Okay. And nobody has told the people at  
18 Dupont that they better tell our safety, health,  
19 and environmental person when they see a big cloud  
20 of gas?

21 A. I think that would be understood. I  
22 would have heard about it. It would have been  
23 mentioned to me, I would hope. Somebody would  
24 have.

25 Q. Is it your understanding that the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 employees feel comfortable and safe in reporting  
2 gas leaks to management?

3 A. I think -- yes. Yes.

4 Q. Is it your understanding that there is an  
5 elementary school, Sorrento Primary School,  
6 located on Highway 22, about a mile from Burnside?

7 A. Yes. It is a new school.

8 Q. How long has it been there?

9 A. It's a relatively new school. The last  
10 couple of years maybe. I'm surprised they built a  
11 school there.

12 Q. And why is that?

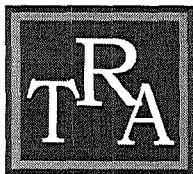
13 A. Just because of the industrial area.  
14 There is a refinery there; there is all kinds of  
15 stuff going on close to that school.

16 Q. Are you aware that there is sugar cane  
17 growing right around the perimeter of Dupont  
18 Burnside?

19 A. Yes.

20 Q. I think we covered this, but I want to  
21 make sure.

22 Dupont has not informed the  
23 administrator of the Environmental Protection  
24 Agency about the extent of the leaks that have  
25 occurred from the CIP; is that true?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. Say that again.

2 Q. As far as you know, Dupont has not  
3 informed the administrator of the Environmental  
4 Protection Agency about the extent of the leaks  
5 that have occurred from the CIP since  
6 December 2011?

7 A. Not that I'm aware of. No. I'm not --  
8 the extent. I don't know if there was a  
9 reportable quantity or not.

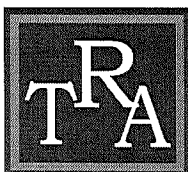
10 Q. Is it your understanding that DuPont has  
11 informed the administrator of the Environmental  
12 Protection Agency about leaks that have occurred  
13 from the CIP?

14 A. The leaks, that I know of, that have been  
15 reported are the ones that are reportable. The  
16 ones that are measured that have to be reported,  
17 that is the ones I'm aware of. I don't know if  
18 they got all the way to the EPA or not. We just  
19 don't call the EPA.

20 Q. I just want to be sure we're clear. My  
21 question is: Has anybody at Dupont informed the  
22 administrator of the EPA about any leaks from the  
23 CIP?

24 A. Not that I know of.

25 Q. Is it the same true for leaks from the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 HIP?

2 A. Not that I know of.

3 Q. And is the same true for leaks from the  
4 converter?

5 A. Not that I know of.

6 Q. As far as you know, Dupont has paid no  
7 fines as a result of leaks from the HIP, the CIP,  
8 or the converter; is that right?

9 A. Not that I know of.

10 Q. Have you ever seen any engineering plans  
11 for the DuPont Burnside facility?

12 A. Yes.

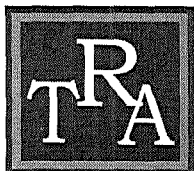
13 What do you mean? Engineering-type  
14 drawings, that type of thing?

15 Q. Yeah. On process, the process portion of  
16 the plant, the engineering plans for the way that  
17 the --

18 A. I've seen drawings. I've seen those type  
19 of things. Yes.

20 Q. And are there sort -- is there sort of a  
21 set of approved engineering plans for the DuPont  
22 Burnside plant?

23 A. When a project is done or they build  
24 something, there is an approved set of drawings,  
25 yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. All right. And as far as you know, there  
2 is such a set of approved drawings for the Dupont  
3 Burnside plant?

4 A. The whole -- I would think so, yes. I'm  
5 sure there is.

6 Q. And that includes the CIP and the HIP and  
7 the converter and the super heater?

8 A. Yes, that is typical.

9 Q. Okay. Do you know whether those plans  
10 include or reflect the box and vacuum hose  
11 apparatus that is being used right now on that  
12 equipment?

13 A. No. I don't know if they have that or  
14 not.

15 Q. Okay. Who would be the person most  
16 knowledgeable about that at Dupont?

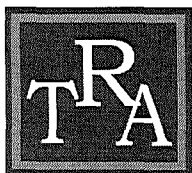
17 A. What do you mean? The drawings?

18 Q. Yes. And whether the --

19 A. It would be an engineer.

20 Q. Okay. Earlier, when I was asking you  
21 about the fact that the administrator of the EPA  
22 had not been informed about leaks from the various  
23 pieces of equipment, I want to ask you the same  
24 question with regard to the super heater.

25 The EPA has not --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. No.

2 Q. Are you aware of any permissible exposure  
3 level established by OSHA with respect to sulfur  
4 trioxide?

5 A. PEL, I would have to look at my  
6 documentation. There is usually a PEL in a lot of  
7 chemicals. I don't think I noticed it on this. I  
8 looked for this a minute ago, for PEL.

9 Q. Okay. Do you have any involvement in  
10 arranging for repairs to the hose and vacuum  
11 systems?

12 A. No. No.

13 Q. We talked a little bit about the Draeger  
14 tube.

15 A. Yes.

16 Q. Are there any tools -- and I think you  
17 said you do not have a Draeger tube at Burnside?

18 A. I have a Draeger tube. Yes, I do have  
19 Draeger tubes.

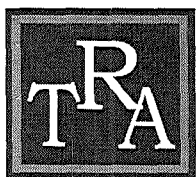
20 Q. You do have a Draeger tube?

21 A. I have Draeger tubes, yes.

22 Q. Have you used the Draeger tube since  
23 December of 2011 to --

24 A. I have not.

25 Q. Okay. Do you know whether anybody at



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Dupont has used the Draeger tube since December of  
2 2011?

3 A. Not that I'm aware of it.

4 Q. Would you have known that if --

5 A. I probably would have bought the tubes.  
6 It is not -- I don't think anybody has used a  
7 Draeger tube.

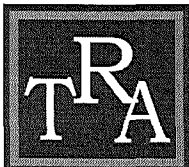
8 Q. Is it not really ready to go; would you  
9 have to buy something to --

10 A. I would think, today, if I wanted to use  
11 a Draeger tube, I would have to look and see what  
12 we got.

13 Q. Are there any tools that you use at  
14 DuPont Burnside to determine the type of gas,  
15 amount of gas, or direction of gas that might be  
16 emitting at the site?

17 A. Well, what we have at the site for  
18 measuring gas streams, you have handheld monitors  
19 for like LEL, oxygen, SO2, those type of things.  
20 CO, carbon monoxide, but most of that is in our  
21 confined space or where you are fixing to weld or  
22 something. There is an SO2 monitor. I think one  
23 of those. That would be it.

24 Q. Okay. So none of those tools would  
25 determine the presence of SO3 gas, right?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Presence of SO3 gas, I think would be  
2 visible again.

3 Q. And there is nobody assigned -- you tell  
4 me: Is there anybody assigned to -- as their  
5 primary job to sit in any given location at DuPont  
6 and watch for a gas leak to arise or be visible?

7 A. The people that would have basically, to  
8 say they were assigned, would be part of the  
9 operator's -- that is part of their duties.

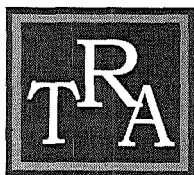
10 Q. Okay. And they can do that from inside  
11 the control room?

12 A. Well, if some of them wanted to. They  
13 don't want to get out of the control room. Others  
14 get out and control room and walk around. Not  
15 everything is visible from the control room. No,  
16 it's not.

17 Q. So in order to see if there was an SO3  
18 gas leak, they would need to walk out in the area  
19 where the likely leak is; they just can't stay in  
20 the control room?

21 A. I don't think they can stay in the  
22 control room if they wanted to go look for a leak.

23 Q. Okay. Do you know whether or not, or  
24 maybe you don't have any personal knowledge of,  
25 were there any alarms on the leaking vessels that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 would -- or on the vacuum and hose apparatus?

2 A. No.

3 Q. Are you aware that the black hoses that  
4 are being used or were being used to try to  
5 capture some of the leaking gas have a tendency to  
6 melt down?

7 A. I'm aware of that. Yes.

8 Q. Okay. And there is no warning system or  
9 no bells and whistles that go off when the hose is  
10 going to --

11 A. No.

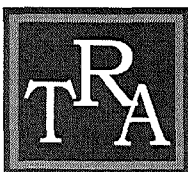
12 Q. -- blow?

13 A. No.

14 Q. Do you have any understanding as to why  
15 the leaks from the CIP, the HIP, the converter,  
16 the super heater, or any of the ductwork and  
17 plenums have not been reported to the EPA before  
18 you took over as the environmental coordinator?

19 A. Now, this is just from T.J.'s version, it  
20 was not a reportable quantity to report.

21 Q. Who told you that? I'm talking about the  
22 time period before it would have been -- before  
23 you took over in the environmental area? Did  
24 somebody tell you that prior to you taking over,  
25 they didn't think that --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Nobody told me anything.

2 Q. Okay. So --

3 A. If there is something that would have  
4 been reported to the EPA, in the form of any kind  
5 of report, I would have known about it.

6 Q. Okay. Even before December of 2012?

7 A. Yes, I would have known about it.

8 Q. And how would you have known about it?

9 A. Just because of my position, being the  
10 safety and being aware of it. There is not --  
11 there is a good amount of transparency out there,  
12 as far as people know what is going on.

13 Q. Okay. So who told you that there had to  
14 be some quantity before you would report these  
15 leaks to EPA?

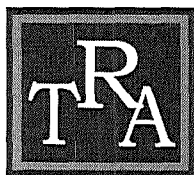
16 A. There is a reportable quantity that is --  
17 there is a number that is there. It is a legal  
18 number. It is a reportable quantity; it's an RQ.

19 Q. And where does, in your understanding,  
20 where does that number come from?

21 A. That comes from whatever their science  
22 testing is. However they get that number, SO3 is  
23 100 pounds.

24 Q. For -- and --

25 A. 100 pounds.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. Are you familiar with TSCA? Have you --

2 A. TSCA, Toxic Substance Control Act.

3 Q. Have you ever read the statute?

4 A. I started looking at the statute. I  
5 haven't read the whole thing. I've had training  
6 on the statute.

7 Q. Is it your understanding that there is  
8 any reportable quantity in the TSCA statute?

9 A. For SO3?

10 Q. Right. For anything, but for SO3.

11 A. A specific number?

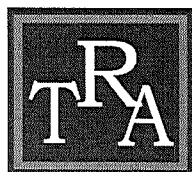
12 Q. Right.

13 A. I don't know for TSCA purposes.

14 Q. So you, before taking your job as  
15 environmental coordinator, were never asked to  
16 determine whether the leaks from the HIP, the CIP,  
17 the converter, the super heater, and ducts and  
18 plenums attached to them, should be reported to  
19 the EPA under TSCA; is that right?

20 A. There was -- if there was not a  
21 measurable quantity that I knew about, I would not  
22 think that.

23 Q. Let me back up because the question was:  
24 Before you took this environmental position, no  
25 one would have asked you to determine under TSCA



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 whether the gas leaks needed to be reported?

2 A. I was not asked under TSCA.

3 Q. After you took your job, the position in  
4 January 2013, where you are the environmental  
5 coordinator for Burnside, have you been asked by  
6 anyone to determine whether the leaks from that  
7 equipment, the HIP, the CIP, the converter that we  
8 have been talking about, should be reported to the  
9 EPA under TSCA?

10 A. No, I have not been requested that.

11 Q. Do you know whether anyone at DuPont has  
12 ever tried to determine whether they should report  
13 that under TSCA?

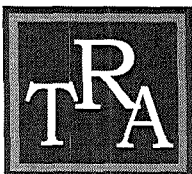
14 A. I would not know that as far as what  
15 their determination might be.

16 Q. Okay. As far as you know, that has not  
17 happened; nobody has assessed these leaks --

18 A. Oh, yeah. Well, there has been testing.  
19 I think I presented that as far as the area  
20 testing and what they call industrial health  
21 testing. There is numbers that I think we  
22 presented.

23 Q. What are you -- you're talking about the  
24 individual monitoring?

25 A. Yes. That is the numbers that I know



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 about, the individual monitoring numbers.

2 Q. And that is not any kind of assessment  
3 that you did with respect to TSCA?

4 A. No. No. It was just what we do.

5 Q. Because there have been some monitoring  
6 results, I think, produced, but I think they stop  
7 in March of 2012; sounds right?

8 A. That might be right.

9 Q. So as far as you know, has there been any  
10 personal monitoring since March of 2012?

11 A. I would have to go look. I don't think  
12 so.

13 Q. So in your appreciation of your job as  
14 the environmental coordinator, all of your  
15 responsibilities kick in after you see a certain  
16 reportable quantity of a chemical or a release?

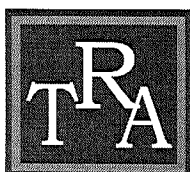
17 A. Say that again.

18 Q. In your responsibilities as the  
19 environmental coordinator, you believe that you  
20 don't really have any responsibilities to report  
21 anything unless you have, what is called, a  
22 reportable quantity?

23 A. To who? The EPA?

24 Q. To anybody.

25 A. That is not what the term that --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 reportable means. If you don't have to report it,  
2 you don't have to report it.

3 Q. That is what I'm trying to understand.

4 In doing your job at Dupont, it is  
5 your understanding that there is some quantity  
6 that you have to have of a chemical before you  
7 have any obligation to report anything to a  
8 governmental agency?

9 A. There is a quantity.

10 Q. Okay. Do you know who told you that or  
11 trained you in that way?

12 A. In those quantities?

13 Q. No. Who made you believe that there had  
14 to be a quantity before you had an obligation to  
15 report it?

16 A. Because that is what some of the laws  
17 state.

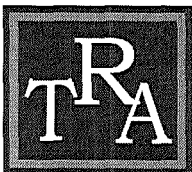
18 Q. Okay. There is also a lot of discussion,  
19 it seems like, in the documents about whether the  
20 gas leaks are traveling off site.

21 A. Okay.

22 Q. You may have seen some language in the  
23 reports about is it going off site.

24 A. Yes.

25 Q. Why is that a relevant question for you



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 at DuPont?

2 A. Why is it a relevant question, because  
3 once it goes off site, you are affecting your  
4 neighbors.

5 Q. Okay. Any other reason why that is?

6 A. That is a pretty good reason.

7 Q. Okay. Have you ever gone and interviewed  
8 or had any conversations with any of the Dupont  
9 neighbors about gas leaks?

10 A. The Dupont neighbors?

11 Q. Uh-huh.

12 A. I've had -- when Impala first knew --  
13 they were building the Impala plant, I had a  
14 discussion about what we could do. That is just  
15 normal conversation that you have, and they told  
16 me what could happen next door. It is sort of  
17 like an introduction. I did have that  
18 conversation. I gave them a MSDS.

19 Q. You gave them an MSDS?

20 A. Yes. I have no problem handing them out.

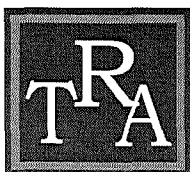
21 Q. They asked you for one or --

22 A. No. I just gave it.

23 Q. And which MSDS did you give them?

24 A. All of them.

25 Q. And what are those?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Sulfuric acid, spent sulfuric acid, and  
2 sulfur trioxide. I think that's it.

3 Q. And when was that meeting?

4 A. That was probably the first part of the  
5 year.

6 Q. Of 2013?

7 A. Yes.

8 Q. And who did you meet with?

9 A. I can't remember the lady's name. She  
10 just moved in from Colorado. We had a phone  
11 conversation first and then we had our discussion.  
12 That is the only time I've ever talked to any  
13 individual.

14 Q. When you talked to her, did you tell her  
15 that there were ongoing leaks from the HIP, the  
16 CIP, and the converter --

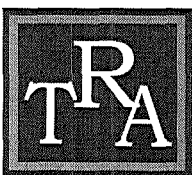
17 A. No.

18 Q. Did you describe for her what an SO3 gas  
19 cloud looks like when it is drifting?

20 A. Yes. That is not -- I would tell people  
21 that, yes, I tell them.

22 Q. So what did you tell her?

23 A. I just tell them it is a big, big white  
24 cloud that is coming in your direction, if it is a  
25 release. Pretty understandable that way.



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And what did she say in your response?

2 A. I hope it doesn't happen. They normally  
3 say, what do I need to do; you get out of the way  
4 of it. There is not a lot else you can do. That  
5 is what we would tell people.

6 Q. Okay. Did you give her your card or  
7 anything and say if you see the white --

8 A. I gave her my phone number. She called  
9 me. And we talked that one time.

10 Q. Okay. Have there been issues that you  
11 are aware of people at Ormet when they owned that  
12 plant that Impala is now, having their cars  
13 speckled with acid in the parking lot?

14 A. Yes.

15 Q. And that was years ago?

16 A. That was years ago.

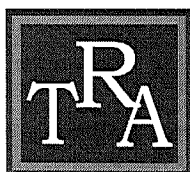
17 Q. Do you recall that happening in  
18 connection with the current leaks from the CIP and  
19 the HIP?

20 A. No. This was during the day of single  
21 absorption, this motor technology.

22 Q. Okay. Are you in charge of scheduling  
23 the security guards that work at Dupont?

24 A. I'm afraid so.

25 Q. And who do they work for?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. They work for G4S. It used to be Wak N  
2 Hut. It's G4S is the name of it.

3 Q. And where is their security booth or  
4 where --

5 A. It is just called the contractor gate.

6 Q. Are there certain folks who work at  
7 DuPont in that position?

8 A. What do you mean?

9 Q. Are they the same guys --

10 A. The guards?

11 Q. Yeah.

12 A. Most of the time, it is.

13 Q. And what are their names? Do you know?

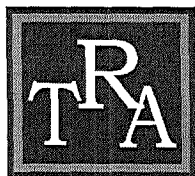
14 A. One is -- Kerry Clemente is the one that  
15 is there. One is called Green. Charles Green or  
16 something like that.

17 Q. Okay.

18 A. I don't know what the -- I call him  
19 Green. That would be the two that are there most  
20 of the time.

21 Q. Okay. Do you know whether they have had  
22 any training on how to recognize an SO3 gas leak  
23 and what SO3 can do to a person?

24 A. We have sent them the MSDS and they are  
25 told if the cloud comes your way, get out of the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 way.

2 Q. Who told them?

3 A. During orientation. Probably would have  
4 been me back whenever they showed up.

5 Q. Since -- because it would have been since  
6 2007?

7 A. We started having them -- I think so.  
8 Somewhere around there. I forgot what day we  
9 posted them there 24/7. I would have to go  
10 double-check my records.

11 Q. Other than to get out of the way, is  
12 there anything else you tell them to do?

13 A. That is about all they can do.

14 (Whereupon, the document referred to is  
15 marked as Exhibit No. 4 for identification.)

16 BY MS. BARNEY:

17 Q. Okay. I'll show you a document that is  
18 DSF74 and we'll mark it Exhibit 4. And I think it  
19 is dated May 27th of 2012.

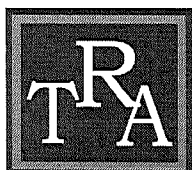
20 A. Yes. I have seen this.

21 Q. What is the title of that document?

22 A. Initial incident report.

23 Q. And you were mentioned on that document,  
24 right?

25 A. Yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. It says "report of a vapor cloud"?

2 A. Uh-huh.

3 Q. And it says the area is the HIP, time is  
4 1530 which is?

5 A. 3:30.

6 Q. 3:30 or 5:30?

7 A. 3:30.

8 Q. And Gamma notified the plant? What is  
9 Gamma?

10 A. Geismar Area Mutual Aid.

11 Q. Okay. Who is the contact person for  
12 Gamma at the plant? Is there a particular person?

13 A. We have a representative that goes to our  
14 meetings.

15 Q. And who is that?

16 A. Cleve.

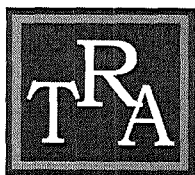
17 Q. So somebody driving down River Road  
18 called and reported a vapor cloud in front of the  
19 plant?

20 A. That is what it says.

21 Q. Okay. And Ascension Parish Fire  
22 Department came out; is that your understanding?

23 A. That is my understanding of this right  
24 now, yes.

25 Q. Do you recall this day? Were you there



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 on May 27th --

2 A. I don't know if I was there or not. I  
3 don't know if they called my house. I would have  
4 to go look at my schedule. I don't know if I was  
5 there on May 27, 2012.

6 Q. How many times has the fire department  
7 called the plant in the years you have been there?

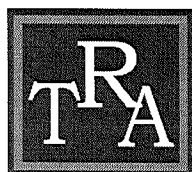
8 A. The fire department called the plant?

9 Q. Yeah. Or Gamma.

10 A. I don't know if Gamma has ever called the  
11 plant or not. Excuse me, they do make -- there is  
12 -- every night there is a Gamma communication  
13 throughout the plants that is done every night.  
14 It is just part of the emergency response system  
15 for the Ascension Parish, but that is the only one  
16 that I remember that somebody made a complaint or  
17 made a report to, was this one.

18 Q. Okay. So on that day, how do you become  
19 involved in this reporting process?

20 A. I think they just called me. I don't  
21 know if I was there or not on that day. Allen,  
22 Allen called my house. It could have been I was  
23 off that day. I don't know. I usually know if  
24 the fire department shows up. I usually know if  
25 they are going to show up, I would know that.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Then you must not have been there because

2 --

3 A. I don't think. I don't know. I would  
4 have typically known. We have had some calls that  
5 have been sort of calls that -- I don't know if it  
6 is hard to -- hard to put this -- these calls were  
7 not reputable calls.

8 Q. What makes you say that?

9 A. Just some individuals.

10 Q. Who do you think made this call that  
11 prompted Gamma to call the plant?

12 A. I have no idea who made that call.

13 Q. You don't know if they are reputable or  
14 not?

15 A. No, I do not.

16 Q. So somebody called you after Gamma called  
17 the plant? Allen Williams called --

18 A. Allen is an operator.

19 Q. And he called you?

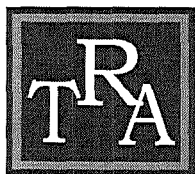
20 A. I think he did. Yes.

21 Q. And what did he say?

22 A. I don't remember from May 27, 2012.

23 Q. Do you know anything about this event at  
24 all that is described on this --

25 A. Yes. I saw this report.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Okay.

2 A. And I did know if there was a Gamma call.

3 Q. You didn't know what?

4 A. I did know there was a Gamma call.

5 Q. So you've seen the report and you knew  
6 there was a Gamma call; is there anything else  
7 about the fire department coming out to the plant  
8 that you know of?

9 A. I never got a report from the fire  
10 department as far as --

11 Q. Did you request one?

12 A. No. Most of the time, if the guys call  
13 me, if they come out there, I usually hear  
14 something, but I did not call them. No.

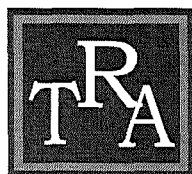
15 Q. So there is no report at DuPont about the  
16 fire department coming out; you didn't go get a  
17 copy of the public report?

18 A. No. No.

19 Q. Why is that?

20 A. I just don't go get a public report. I  
21 have not been told to do that or have done it. If  
22 I was informed to do something like that, I would  
23 have.

24 Q. Who would be the person to instruct you  
25 to get a copy of a fire department report that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1     pertains to the plant that you are the safety,  
2     health, and environmental coordinator for?

3             A.   Who would tell me to do that?

4             Q.   Uh-huh.  If you needed to be told to do  
5     that, who would tell you?

6             A.   It would have to be somebody like the  
7     plant manager or whoever would be my supervisor.

8             Q.   All right.  You wouldn't take it upon  
9     yourself as the health, safety, and environmental  
10    coordinator to go get a copy of that report?

11            A.   Not this one.

12            Q.   Are there others that you have gone and  
13    gotten copies of?

14            A.   No.  We haven't had that many of these  
15    take place.

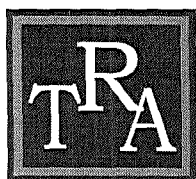
16            Q.   So you would try to keep it verbal; is  
17    that what you are saying?

18            A.   Sometimes that is how it is, is verbal.

19            Q.   Have you ever been told or come to  
20    understand as part of your job at DuPont that  
21    obtaining paper can create a legal document that  
22    DuPont has to deal with?

23            A.   Oh, yeah.

24            Q.   There have been some documents produced  
25    that are Bates labeled DSF83 and DSF16 through 18.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

MS. WEINER:

And you said 83?

MS. BARNEY:

Yeah.

MS. WEINER:

I may not have that one. So you  
may have to give --

MS. BARNEY:

Okay. I do have an extra one.

BY MS. BARNEY:

Q. Why don't we start with -- we'll do them  
in order of the document number so we can start  
with No. 83. -- well, look at them as a group.

A. Which one is 83?

MS. WEINER:

Right here.

THE WITNESS:

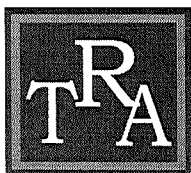
Oh, okay.

BY MS. BARNEY:

Q. Have you ever seen documents like this  
before?

A. Yeah. I'm the one that probably sent  
them to her.

Q. So -- and that is true for all four of  
these sheets?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I think you got these yesterday.

2 MS. WEINER:

3 I'll tell you 16 through 18 came  
4 from him. 83 was in connection with a whole bunch  
5 of other production. I can't tell you right now,  
6 sitting here, who that came from. I don't believe  
7 it was Mr. Ozbun.

8 THE WITNESS:

9 I don't believe it was. I sent a  
10 handful yesterday or day before.

11 MS. BARNEY:

12 Let's break them up, then. We'll  
13 mark No. 83 as Exhibit 5 and we'll mark 16 through  
14 18 as Exhibit 6.

15 (Whereupon, the document referred to is  
16 marked as Exhibit Nos. 5 and 6 for  
17 identification.)

18 BY MS. BARNEY:

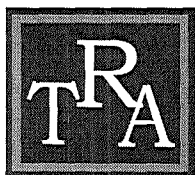
19 Q. As you recall, have you ever seen the one  
20 marked as Exhibit 5, which is 83?

21 A. This one, no.

22 Q. You've never seen that before?

23 A. No.

24 Q. But you have seen, and you believe you  
25 prepared the documents Bates labeled 1016 through



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 1018?

2 A. No. I did not say I prepared those.

3 Q. Oh, okay. I'm sorry. You gave them to  
4 Ms. Weiner?

5 A. I found them.

6 Q. Okay. 16 through 18?

7 A. Yes.

8 Q. And you delivered -- you gave them to Ms.  
9 Weiner?

10 A. Yes. I attached them to an e-mail I sent  
11 to her.

12 Q. Okay.

13 A. She requested information on HIP and CIP,  
14 right.

15 MS. WEINER:

16 Uh-huh.

17 THE WITNESS:

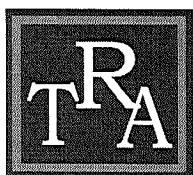
18 I saw this was information on HIP  
19 and CIP, so that is what I found. I made copies,  
20 attachment to an e-mail to her.

21 BY MS. BARNEY:

22 Q. Those are the ones what we've marked as  
23 Exhibit 6 on this copy.

24 A. Yes. That is the one I sent her.

25 Q. So have you ever -- where did you find



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 the ones that are marked as Exhibit 6, the ones  
2 you gave to --

3 A. I went digging because that was a  
4 request. I found them in the environmental files.

5 Q. Okay.

6 A. That is the only place I knew to go look  
7 and it was just a Word document, and anything I  
8 saw with HIP and CIP, I clicked on it and made a  
9 copy of it.

10 Q. Okay. So these are what? What do you  
11 call these documents?

12 A. Those are calculations. That is what I  
13 call them is calculations.

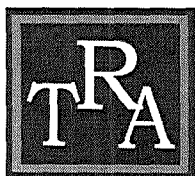
14 Q. Okay. Are these in some particular  
15 folder on the Word processor under calculations?

16 A. It is a list of documents. There is  
17 various amounts of documents on that one list.

18 Q. And on the name of the document on every  
19 document, did it say which vessel it was  
20 pertaining to?

21 A. That is the only reason I found out.  
22 When I saw that word "HIP and CIP," that she  
23 requested, that is why I clicked on it.

24 Q. Were there any calculations that didn't  
25 have a vessel attached to it?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I don't remember that. No.

2 Q. You can pretty much click down the  
3 documents and say --

4 A. I don't know what all those documents  
5 were. The only ones I went to are the ones that  
6 actually said HIP and CIP and I think converter is  
7 what she requested.

8 Q. So by looking at the file name, if it  
9 said HIP or CIP, you pulled it?

10 A. Yes. I just read what the file was  
11 called on that particular part of the electronic  
12 files.

13 Q. And you didn't -- but you didn't open up  
14 every document and see if it talked about the CIP  
15 or the HIP?

16 A. No. Because the way they were all  
17 identified as something. But it wasn't HIP and  
18 CIP.

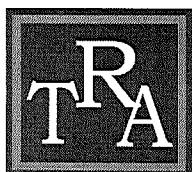
19 Q. So they all had a vessel name --

20 A. Or something. Yeah.

21 Q. -- that made --

22 A. I just went to the ones that said HIP and  
23 CIP.

24 Q. Yeah. And what I'm trying to understand  
25 is that, you know, on the file list, could you --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 did you need to open the document to know if it  
2 pertained to the HIP and the CIP?

3 A. No, I did not.

4 Q. All right. Do you know who prepared the  
5 documents that are Bates labeled 1016 through  
6 1018?

7 A. I do not know.

8 Q. Do you know why they are in the  
9 environmental files?

10 A. They were calculations.

11 Q. Of what?

12 A. It looks like calculations for gas leaks.  
13 That is what it says.

14 Q. Okay. And same for No. 83, does that  
15 look like, Bates No. 83 --

16 A. That is what it looks like, yes.

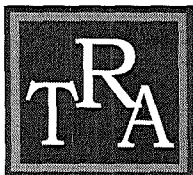
17 Q. All right. Do you know who performed  
18 these calculations?

19 A. No.

20 Q. Do you know what date they were  
21 performed?

22 A. No.

23 Q. When you pulled up the document on the  
24 system, the date it was created would be available  
25 on the Word processor?



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I'm assuming it would be.

2 Q. Okay.

3 A. I don't know if it is or isn't.

4 MS. BARNEY:

5 Is that information that maybe you  
6 can capture, Monique -- I don't know. These  
7 documents are undated so...

8 MS. WEINER:

9 We'll look into it.

10 MS. BARNEY:

11 Okay. I don't know if they can do  
12 a print screen or something.

13 BY MS. BARNEY:

14 Q. So you don't know when these were  
15 prepared?

16 A. No, I do not.

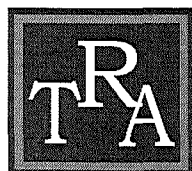
17 Q. I take it they haven't been prepared  
18 since January 2013, right?

19 A. No. I didn't request anything like this.  
20 No. If they were prepared, I didn't ask for them.

21 Q. And they probably couldn't have jumped  
22 into your file?

23 A. They don't jump in there.

24 Q. So they must have been existing before  
25 January 2013?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I'm assuming they would be.

2 Q. Do you know whose job function it might  
3 be at DuPont to run these calculations?

4 A. This looks like engineer stuff.

5 Q. And why would you not have requested  
6 something like this?

7 A. I never did.

8 Q. Why is that?

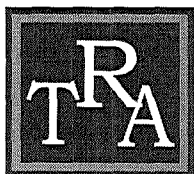
9 A. I never sought a reason to. When I saw  
10 these, these particular calculations, this is the  
11 first time I had seen these. When I came to this  
12 format is when I clicked on them yesterday, when I  
13 found them or day before now, so I didn't know --  
14 I was not aware of these until I started digging,  
15 until that request was made.

16 Q. So since you have been given the  
17 environmental responsibilities at DuPont, no one  
18 has told you that it is possible to run  
19 calculations like we see here on these Pages 83  
20 and 1016 through 1018?

21 A. Nobody has told me that.

22 Q. What is your understanding of what these  
23 documents say?

24 A. I've looked at them more right now than  
25 when I sent them to her yesterday. I got the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 information, clicked on them, detached them, put  
2 them in an e-mail.

3 Q. Have you ever had any conversations with  
4 Matt Barnes about documents like this?

5 A. I don't know about like this, but we  
6 talked about calculations. I don't know if this  
7 was specific calculations or not. Yes, we have.

8 Q. Tell me about that. When is the first  
9 time you talked with Matt Barnes about that?

10 A. About calculations? I don't know if it  
11 had anything to do with HIP and CIP. I think the  
12 calculations we were probably talking about were  
13 on one of our outfalls.

14 Q. Okay. Have you ever talked to him about  
15 calculations of gas leaks on the HIP and the CIP  
16 or the converter?

17 A. No, I have not.

18 Q. As far as you know, these documents have  
19 never been given to the EPA or the DEQ?

20 A. Not as far as I know.

21 Q. When you went to look for documents the  
22 other day, you did not find the one that is Bates  
23 labeled 83; is that right?

24 A. This one, I don't think so.

25 Q. Could it be because it is the converter;



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 were you only looking for the HIP and the CIP?

2 A. I just -- you sent me the e-mail and  
3 whatever that e-mail said is what I looked for.

4 MS. WEINER:

5 1016 references the converter, as  
6 well.

7 BY MS. BARNEY:

8 Q. Okay. So when you looked on your  
9 computer, you did not find --

10 A. I did not see that one --

11 Q. -- 83?

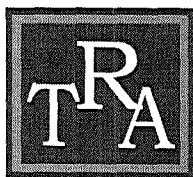
12 A. I went through everything that -- I did a  
13 quick scan looking for those words. I did not see  
14 this one. If I would have, I would have attached  
15 it.

16 Q. When is the first time -- let me back up.  
17 Before January 2013, would you have been in charge  
18 of the files that contained these documents?

19 A. Not in charge of, they are there. It is  
20 on a common drive.

21 Q. All right. So anybody at Dupont can --

22 A. I think some of those -- anybody at  
23 DuPont, I don't think so. But I doubt -- it may  
24 be a read only. I don't know how these are set  
25 up, as far as going in to make changes on



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 something like this. I don't know if I could or  
2 could not. A lot of those are read only.

3 Q. So these are just computer files; they  
4 are not physical files in your office?

5 A. No. These were actually on the computer.

6 Q. And you don't know who has access to them  
7 other than you?

8 A. I think Matt would probably be able to  
9 get to them. Kerry Long before me. I don't know  
10 about anybody else that would go in there to look  
11 for them. I just don't know. I'm not familiar  
12 with everybody's rights as far as -- I just don't  
13 keep up with that.

14 Q. Do you know if you have limited rights  
15 where you can only access documents maybe that  
16 were created as of --

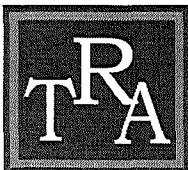
17 A. I think --

18 Q. Wait, let me finish my question.

19 Do you only have limited rights  
20 such that you can only access documents that were  
21 created since, say, maybe January 2013 when you  
22 became the environmental coordinator?

23 A. No. Those limitations have not been put  
24 on me.

25 Q. So if you have access to environmental



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 files, you have access to environmental files  
2 going back before you were the environmental  
3 coordinator?

4 A. I don't know. I'm guessing. I might.  
5 That is where I found these.

6 Q. Okay. So as far as you know, these  
7 calculations weren't done -- well, you don't know  
8 when they were done or why they were done?

9 A. I didn't look for dates. I didn't look  
10 for anything. I just look for HIP and the CIP  
11 because that is what was requested, and that is  
12 why I started clicking and copying and pasting.

13 Q. When you copied and pasted, you actually  
14 took the contents and copied them?

15 A. Because I had to put it in an attachment  
16 form.

17 Q. What kind of form are they in on the  
18 computer?

19 A. Is this an Excel spreadsheet?

20 MS. WEINER:

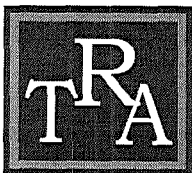
21 I think so, yeah.

22 THE WITNESS:

23 That is what they were.

24 BY MS. BARNEY:

25 Q. So you could download these, I guess?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. I can go get a copy of them, put them on  
2 my personal drive, and I collected them all in one  
3 folder, that way it was easier for me to send an  
4 e-mail.

5           Q. Okay. Did you ask Matt if he has any  
6 more of these?

7           A. No, I did not.

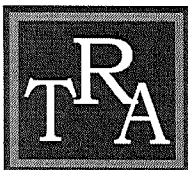
8           Q. Because you've never had a conversation  
9 with him about these?

10          A. These, I don't think -- I don't know --  
11 he didn't even know I did this probably.

12          Q. And you -- is this a formula on an Excel  
13 spreadsheet, do you know?

14          A. I'm looking at what is up there. It  
15 looks like a formula to me. For me to explain it  
16 to you, it is not going to happen because I can't.  
17 It is not going to happen. I don't know where  
18 these calculations came from. Looks like Perry's  
19 Chemical Engineering Handbook from 1984. You know  
20 as much as I do now about these.

21          Q. So this is not something that obviously  
22 you have used in connection with your job at  
23 Dupont in deciding whether or not to report the  
24 gas leaks from the HIP, the CIP, and the  
25 converter?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. No, I have not.

2 Q. Would you be the one at DuPont Burnside  
3 to decide whether to report the leaks from the  
4 HIP, the CIP and the converter and the super  
5 heater and the ductwork?

6 A. You mean report them to an agency?

7 Q. Right.

8 A. We would do these calculations. We would  
9 see what they were. There is a reportable  
10 quantity, once again, we talked about earlier.

11 Q. Right. But --

12 A. That is what we go by.

13 Q. Let me start over, okay.

14 I think you said you didn't see  
15 these documents until you pulled them up?

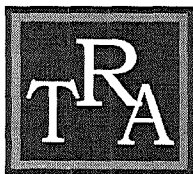
16 A. But they are reportable quantities of  
17 anything.

18 Q. Okay. Let me strike that as  
19 nonresponsive.

20 Would you be the person at Dupont  
21 who would make the decision -- we are getting away  
22 from the documents.

23 A. Okay.

24 Q. Would you be the person at DuPont that  
25 would make the decision whether or not to report



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 gas leaks from the HIP, the CIP, the converter,  
2 the super heater and the ductwork and plenums?

3 A. Would I be the only person?

4 Q. Correct.

5 A. No.

6 Q. Who else would be involved in that --

7 A. I'm sure there were some conversations  
8 with Tom.

9 Q. Who else?

10 A. I might talk to Matt.

11 Q. Okay. Who else?

12 A. That would be it probably.

13 Q. Have there been any discussions like  
14 that?

15 A. Not that I know of.

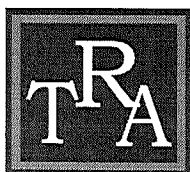
16 Q. Have you felt the need to initiate such a  
17 discussion?

18 A. No. Because -- I have not.

19 Q. And why is that? You started to say why.

20 A. I haven't had the need to. When I looked  
21 at the red logbook to go see, if I heard something  
22 or that type of thing, it would -- it didn't go  
23 off site, which is some of the things I read, I  
24 did not report those.

25 Q. Okay. You haven't reported any leaks to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 an outside agency, right?

2 A. I have reported leaks but not the HIP or  
3 the CIP leaks.

4 Q. Or the converter or the super heater?

5 A. No, I have not.

6 Q. Or the ductworks or plenums attached to  
7 it?

8 A. No, I have not.

9 Q. Have you ever seen any documents that  
10 describe in any way the quantity of gas that is in  
11 the black hose system?

12 A. No.

13 Q. Do you know whether any such documents  
14 exist?

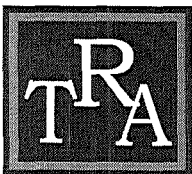
15 A. I don't know.

16 Q. Do you have any documents that tell you  
17 the number of feet of black plastic hose that was  
18 -- is connected or was connected to the HIP and  
19 the CIP and the converter?

20 A. No, I do not.

21 Q. And that is just not something that you  
22 believe is relevant to the health, safety, and  
23 environment of the plant?

24 A. I didn't say that. I just said I did not  
25 have access to them.



1 Q. Okay. Do you think it is relevant to the  
2 health, safety, and environment --

3 A. The number of feet?

4 Q. Right.

5 A. Not really.

6 Q. Okay. Where would those documents be?  
7 You said you didn't have access to them.

8 A. What do you mean?

9 Q. To the documents that reflect the number  
10 of feet?

11 A. I don't know where those would be. I  
12 have no idea how many feet. I don't know if those  
13 were kept or not. I don't know.

14 Q. Okay. Is there anybody at the Burnside  
15 plant who you think is capable of running the  
16 calculations that are on Exhibits 5 and 6?

17 A. Yes.

18 Q. Who?

19 A. Chemical engineer.

20 Q. Who is that?

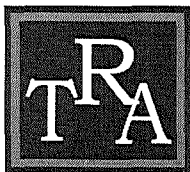
21 A. Dan.

22 Q. Dan Monhollen?

23 A. Yes.

24 Q. Anybody else?

25 A. I doubt it.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And do you know who trained Dan --

2 A. Virginia Tech.

3 Q. -- on doing this?

4 A. He is an engineer from Virginia Tech.

5 Q. So you are talking about his university,  
6 his education?

7 A. Yes. That probably would be part of it,  
8 I'm assuming, from what -- he is a chemical  
9 engineer.

10 Q. Did anybody, as far as you know, help  
11 train Dan once he got to Dupont?

12 A. Trained Dan for what?

13 Q. This sort of work with Exhibits 5 and 6?

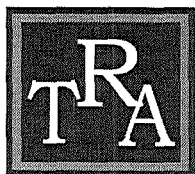
14 A. He probably couldn't come to DuPont if he  
15 couldn't do that.

16 Q. Okay. Are you aware of Tom Miller  
17 discouraging employees from calling outside  
18 agencies?

19 A. No. I'm not aware of that. I think it  
20 would be the reverse.

21 Q. All right. Have you ever seen any  
22 document or e-mail or instruction from Tom Miller  
23 to the employees to be sure and call outside  
24 authorities if they see a gas leak?

25 A. I don't know of anything in writing. I



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 do know that in the meetings to make sure -- to  
2 make people aware of what is going on.

3 Q. What is that meeting?

4 A. We are not -- they state to make the  
5 notifications, call who we need to call. I don't  
6 think he has ever, that I have knowledge of,  
7 discouraged anybody from doing the right thing.

8 Q. Has he discouraged people from calling  
9 outside agencies about gas leaks?

10 A. Not that I know of.

11 Q. Has he ever indicated to you that if  
12 outside agencies were called, then the plant might  
13 be shut down and people might lose their jobs?

14 A. No. I haven't heard that.

15 (Whereupon, the document referred to is  
16 marked as Exhibit No. 7 for identification.)

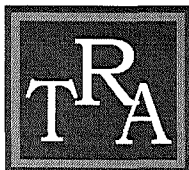
17 MS. BARNEY:

18 Q. I'll show you a document that we'll mark  
19 as Exhibit 7, which is Bates numbers 966 through  
20 the 69. Here is Exhibit 7, which is a letter from  
21 OSHA dated May 25, 2012 to Tom Miller and Larry  
22 Howard --

23 A. Uh-huh.

24 Q. -- at DuPont Burnside.

25 Have you seen that letter before?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. About two days ago maybe.

2 Q. And is that the first time you saw it was  
3 two days ago?

4 A. Yes.

5 Q. And by May of 2012, you had been the  
6 safety coordinator since '07; is that right, after  
7 Ann Lafarrera left?

8 A. Yes. On my temporary assignment that  
9 lasted forever.

10 Q. Okay. Do you know why that letter would  
11 not have been directed to you?

12 A. I have no clue.

13 Q. As far as you know, it should have gone  
14 to you?

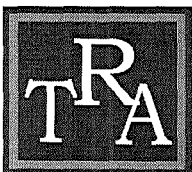
15 A. I don't know that for a fact, either. It  
16 looks like it went to the two people. I know it  
17 went to the one person that needed to know the  
18 most, was Tom Miller. Larry Howard, Larry Howard  
19 is one of the regional guys. That is maybe why he  
20 sent it to him.

21 Q. This is coming from OSHA in Baton Rouge.

22 A. Okay.

23 Q. Do you know why they would have Larry  
24 Howard's name?

25 A. Larry Howard was sort of one of our



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 regional safety guys at that time.

2 Q. He is the guy who came down for the  
3 audit?

4 A. Yes. He has that pedigree.

5 Q. And what is his pedigree?

6 A. The safety professional pedigree, the  
7 PSM. He has been doing it a lot with his career  
8 at DuPont.

9 Q. Does he have any credentials that you  
10 don't have?

11 A. Oh, I'm sure he does.

12 Q. Like what?

13 A. He is a regional type of guy. He doesn't  
14 get that job without more credentials.

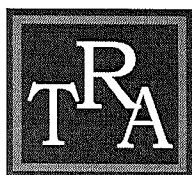
15 Q. Do you know what his degree is in?

16 A. I think he got a degree from one of the  
17 universities. I think Murray State. I think  
18 that, and I can't prove that, but I think that.  
19 But he was working for Dupont somewhere up there.

20 Q. So the first time you saw this letter was  
21 a few days ago?

22 A. Yes.

23 Q. If you had seen this letter in 2012,  
24 would it have been reflected on the posting that  
25 you did in 2013? I know you said you had to do



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 that log for --

2 A. That wouldn't have anything to do with  
3 that.

4 Q. Why is that?

5 A. Because the 300 log is for injuries,  
6 illnesses that actually happen as stitches or  
7 something like that. That is what that log is  
8 for.

9 Q. So you wouldn't have to log --

10 A. This, no.

11 Q. -- gas exposure?

12 A. Not that one, no.

13 Q. Not this one or any gas?

14 A. I wouldn't have to log it with an OSHA  
15 log, no.

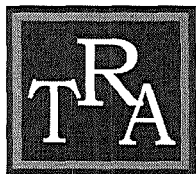
16 Q. I want to clarify.

17 If a person is exposed to SO3 gas  
18 or SO2 gas at the site, would that be something  
19 that would be on the log for OSHA that you  
20 generate?

21 A. No.

22 Q. Why is that?

23 A. It would -- I would have to get the  
24 report from the doctor stating what actually  
25 happened to that individual, and what was the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 diagnosis, what was the treatment, off the job, on  
2 the job, was it work related, or was it an  
3 aggravation at work, did it happen at home, how  
4 long will he be off, or she will be off, will they  
5 be off, can the continue, those are the kinds of  
6 things that I would get from a professional to let  
7 me know that that was necessary.

8 Q. Did you call Dr. Bailey when you heard  
9 that Leo Scott had been exposed to gas, did you  
10 call Dr. --

11 A. I did not call Dr. Bailey.

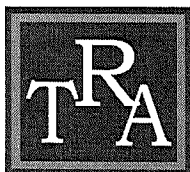
12 Q. How would you expect to get the report  
13 from the doctor --

14 A. I would expect that to come from someone  
15 else.

16 Q. Like who?

17 A. I would think it would be a supervisor.  
18 And I might get a copy of it from the nurse as far  
19 as her determination, but I don't think it would  
20 be -- I don't have to explain it. It is sent to  
21 you. It is the site's determination to put it on  
22 the log or not and that is usually sent to the  
23 supervisor.

24 Q. So somebody else would decide whether to  
25 go get Leo Scott's medical reports and make them



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 available to you so they can get on the log?

2 A. Most of the time because I really can't  
3 get Leo Scott's records.

4 Q. If you heard that he was exposed, can you  
5 go to Denise, the company nurse, and say, "What's  
6 the deal? I heard Leo got exposed. I have a" --

7 A. I think --

8 Q. Wait, let me finish.

9 "I have a report to do to OSHA; I  
10 want it to be accurate. If Leo got exposed, I  
11 need to write it down"?

12 A. No.

13 Q. Did you have that conversation?

14 A. No.

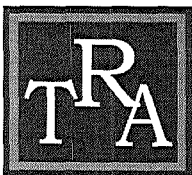
15 Q. Any reason why?

16 A. No.

17 (Whereupon, the document referred to is  
18 marked as Exhibit No. 8 for identification.)

19 BY MS. BARNEY:

20 Q. There is a response, I believe, to this  
21 Exhibit 7 that we'll mark as Exhibit 8 and it is  
22 dated June 1 of 2012, Bates label 963 to 964. I  
23 believe this is one of the ones you reviewed  
24 before your deposition and you can confirm that  
25 for me.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. Yes, this is the one that I think I saw.  
2       This one.

3           Q. Okay. You are cced on that document?

4           A. I do see that.

5           Q. So you would have gotten a copy of that  
6       document, June 1, 2012?

7           A. It says here I was cced on it. I asked  
8       the question when I saw this, I don't know if I  
9       got a copy or not. If it came in a form of an  
10      e-mail, I don't know. I actually went back and  
11      looked through some older e-mails to see if this  
12      is something I missed.

13          Q. And it wasn't?

14          A. I could not find any e-mail that had this  
15      information on it at that point.

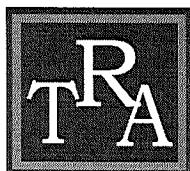
16          Q. Okay.

17          A. I think that is the first time I saw it  
18      was the other day.

19          Q. So the first time you feel like you saw  
20      this June 1 letter was the same time you saw the  
21      May letter, which was a couple of days ago,  
22      Friday, when you were getting ready for your  
23      deposition?

24          A. That is what it sounds to me.

25          Q. And you've actually done a little



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 investigation on the computer to make sure you  
2 didn't miss something, right?

3 A. I don't know how far I went back. We  
4 went from Lotus Notes Database to Outlook to  
5 transfer some e-mails over. I tried to dig back  
6 as far as I could. I did not find this one. It  
7 may be there, but I did not find it.

8 Q. So your name is shown as a carbon copy  
9 but --

10 A. And I don't think I got a hard copy, as  
11 far as a letter form.

12 Q. If you got a copy of a letter like this  
13 on June 1, 2012, where would you have put it?

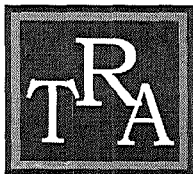
14 A. I would have filed it. I would have at  
15 least started me a file, I'm sure, because I would  
16 want to keep that.

17 Q. What would the file be?

18 A. I would probably put OSHA on there and  
19 stick it in the file cabinet or I would have  
20 questioned it.

21 Q. Okay. And so you are pretty confident  
22 that you haven't seen this before because you  
23 didn't create a hard file and you don't find an  
24 electronic file?

25 A. That is what I said.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. Okay. The letter says that it is  
2 attaching SAF 106, it says that on Page 2 about  
3 the first full paragraph. It attaches a copy of  
4 SAF 106.

5 A. Uh-huh.

6 Q. And that is, apparently, a summary of the  
7 PPE assessment, required PPE for routine jobs and  
8 maintenance activities?

9 A. That is SAF 106, a portion of the safety  
10 manual. That discusses PPE is what it does and  
11 there is a PPE matrix that has an attachment to  
12 the SAF task-wise, what to wear per certain tasks.

13 Q. Okay.

14 A. It tells you what to wear, gloves, that  
15 type of thing, and it is a matrix to tell you what  
16 to wear for certain tasks.

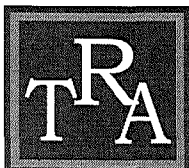
17 Q. Does it have an instruction for what to  
18 wear when you are working in the proximity of an  
19 SO3 gas leak?

20 A. It has instructions for working with SO3  
21 gas, yes, what is PELs.

22 Q. Okay. And is that what --

23 A. I don't think it uses the words "close  
24 proximity."

25 Q. I don't know if I said "close."



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. Or proximity. I do note as the task is  
2 loading of an SO3 car, there are PPEs to wear.

3           Q. So if the question was what PPE do I wear  
4 when I'm in proximity of an SO3 gas leak, would  
5 that be what you gave me earlier, which was the  
6 full-face respirator, the full-acid suit, the  
7 gloves, the boots, the hood?

8           A. In close proximity or in proximity of  
9 that leak itself?

10          Q. Yes.

11          A. If you were going to go there and address  
12 that leak, you would wear that.

13          Q. What if you were just going to have the  
14 gas pass over your face as you walk by?

15          A. I don't think we would walk into that.

16          Q. I'm sorry?

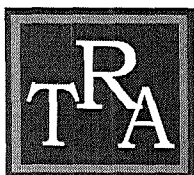
17          A. You would not consciously walk into  
18 something like that.

19          Q. Okay. So you either have to be prepared,  
20 right, for the gas --

21          A. Most of the time.

22          Q. -- before it hits you, or it is going to  
23 hit you without PPE on; is that right?

24          A. When you are working with SO3, yes.  
25 There is preparation and that is part of the rules



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 that you wear what we talked about earlier.

2 Q. And if there is a gas leak on the site,  
3 which we have been talking about for hours --

4 A. Yes.

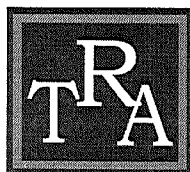
5 Q. -- and you don't want to get it in your  
6 eyes or your mouth or on your skin, then when you  
7 -- you either have to put the PPE on when you walk  
8 in that area or you just take your chances and see  
9 if the gas hits you; is that right?

10 A. They get in the area with leak and they  
11 can see what direction it is or whatever, then  
12 they would put the suit on; it would be part of  
13 the work permit and they would go address whatever  
14 task was involved.

15 Q. Okay. From your standpoint, I guess, and  
16 my question with the SAF is, is there -- if you  
17 were going to look at this SAF 106 and you were  
18 going to be working in the area of the CIP and the  
19 HIP and the converter, even if you weren't working  
20 on the leaks, you were working by the leaks, then  
21 would the SAF tell you what to wear?

22 A. I don't think I would be working by the  
23 leaks because there would be other people working  
24 on the leaks. I would not.

25 Q. Does SAF --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. There is nothing there that tells me that  
2 I'm going to be working by that leak.

3 Q. My question is, and maybe you've answered  
4 it, if they are going to be working in the  
5 vicinity of an SO3 gas leak, they need to wear the  
6 PPE that you described earlier; is that the  
7 answer?

8 A. If the SO3 gas leak is visible, they  
9 would be, because they would be addressing that  
10 leak. You would not allow anybody to go walking  
11 in that area if there is an SO3 leak.

12 Q. Who is standing there to prevent that?  
13 You?

14 A. The work permitting.

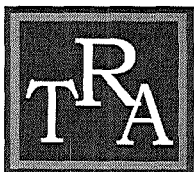
15 Q. Are you telling me that nobody walks  
16 around the CIP, the HIP, and the converter --

17 A. This --

18 Q. Wait, let me finish.

19 This equipment has been leaking  
20 from December 2011 until September of 2013; are  
21 you telling me that nobody has been walking  
22 through that area during that entire time period?

23 A. We have been walking around it, yeah. We  
24 walk through that. But it is not an SO3 gas  
25 cloud.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. How do you know?

2 A. Because it is visible.

3 Q. You are in your office, right?

4 A. I know. I know what I know about SO3.

5 Q. And you weren't out there when Leo Scott  
6 got exposed to the gas, right?

7 A. I wasn't out there when Leo Scott did a  
8 lot of things.

9 Q. Do you have any say-so in terms of what  
10 the KBR people wear when they actually go and  
11 adjust the hoses and the vacuum systems on the  
12 leaks?

13 A. I do not have any say-so.

14 Q. So they can wear whatever they want?

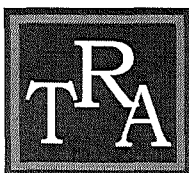
15 A. They have their supervision that tells  
16 them what to wear and, of course, the control room  
17 communicates that through the permitting process.

18 Q. Who tells KBR what gas they are being  
19 exposed to?

20 A. That is part of their training.

21 Q. So if Lonnie Blanchard testified that he  
22 thought it was SO2, where should he have gotten  
23 the information that it was SO3?

24 A. They have classes. They have training  
25 courses.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Okay. So you think he was just mistaken?

2 A. I don't do training with KBR.

3 Mistaken about what? What was he  
4 mistaken about?

5 Q. About whether he was working with hoses  
6 that had SO3 in them.

7 A. And what was your question to me?

8 Q. Whether he thought it was just SO2,  
9 whether he was mistaken?

10 A. I don't think he was mistaken. I don't  
11 think it was SO3 pouring out.

12 Q. I don't think I ever said the word  
13 "pouring out."

14 A. I'm thinking that is what it would have  
15 to be if he said that.

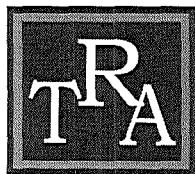
16 Q. Okay.

17 A. I'm not -- I won't talk about Lonnie.

18 Q. So you did not have any conversations  
19 with Mr. Miller about the content of the June 1,  
20 2012 letter?

21 A. No, I did not.

22 Q. Is it your understanding that this letter  
23 went to OSHA about the same time as everybody was  
24 commenting about how ridiculous it was for Leo  
25 Scott to be wearing PPE at the plant?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I don't know if the word "ridiculous" was  
2 used.

3 Q. What is your word for that? I think you  
4 spoke to that earlier.

5 A. I just had never seen anybody wear --

6 Q. You thought it was odd; that was the  
7 word, "odd."

8 A. Yes, it was odd.

9 Q. So this letter went out about the time  
10 you thought it was odd that Leo Scott was --

11 A. I don't know that. I don't know -- I  
12 don't know if that was definitively the same time  
13 or not.

14 Q. Have you -- so this is the first -- you  
15 don't know anything about this letter until two  
16 days ago; you haven't had any conversations since  
17 or?

18 A. With who, Tom?

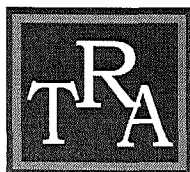
19 Q. Anybody other than Monique.

20 MS. WEINER:

21 You don't have to tell her about  
22 your conversations with me.

23 THE WITNESS:

24 I didn't talk to anybody about  
25 this.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 BY MS. BARNEY:

2 Q. So you don't know where Mr. Miller got  
3 the content for this letter; it wasn't from you?

4 A. From me, no.

5 Q. And you didn't provide him with a copy of  
6 SAF 106?

7 A. He has access to his own copy.

8 Q. Okay. And he would have had access to  
9 the monitoring data that was attached, or would he  
10 have to get that from someone?

11 A. The monitoring, he has access to, I  
12 doubt. I don't think he does, but I doubt it. He  
13 would probably ask for that from someone.

14 Q. From you or?

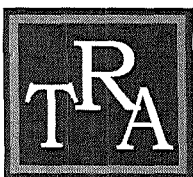
15 A. If he needed monitoring data, I think he  
16 probably would, or he would ask where he could  
17 find it.

18 Q. So I don't know if your copy has it, but  
19 Bates No. 969 is a copy of some monitoring that  
20 was sent with the June 1 letter to OSHA. It is  
21 969.

22 MS. WEINER:

23 It is attached to the back of  
24 Exhibit 7.

25 MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Okay.

2 THE WITNESS:

3 Okay.

4 BY MS. BARNEY:

5 Q. Would you have given that to Mr. Miller  
6 to send to OSHA?

7 A. I don't know if I would have given it to  
8 him or not.

9 Q. You don't remember?

10 A. I don't think I did, if he requested it.  
11 I don't remember doing that.

12 Q. Okay.

13 A. He could have gotten it from somebody  
14 else or pointed in the right direction. And I  
15 would have to go double-check because I don't  
16 know.

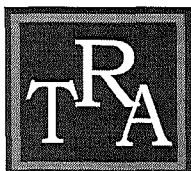
17 Q. Okay. So you have no idea how much SO3  
18 gas the employees at DuPont have been exposed to  
19 since March 2012?

20 A. I do not.

21 Q. Okay. And there has been no way to  
22 assess that, that you know of; is that right?

23 A. I have -- no, not that I know of.

24 Q. This turnaround that took place late  
25 September, early October --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Okay.

2 Q. -- that was a regularly-scheduled  
3 turnaround; is that right?

4 A. Pretty much.

5 Q. And the last cold shutdown took place  
6 during the prior regularly-scheduled turnaround,  
7 right?

8 A. Probably. I don't remember another cold  
9 shutdown, but I do know there was probably one in  
10 2011, I think, was our last shutdown, March or  
11 April, somewhere in 2011.

12 Q. Okay. Were you involved in any way in  
13 the repairs done during the shutdown?

14 A. No.

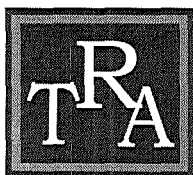
15 Q. Do you have any information on what  
16 success they had in fixing leaks in the CIP, the  
17 HIP, the converter, the super heater, and any of  
18 the ductwork and the plenum attached to those?

19 A. Do I have access?

20 Q. Do you have any information on the  
21 success that they have or lack of success they  
22 had?

23 A. I hear during the meetings what they have  
24 to do during the work on it and post.

25 Q. Okay. Tell me about that.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. They went back down for a couple of days  
2 and did some more work.

3           Q. Okay. Let's go back to during the  
4 shutdown. Did they say whether or not during the  
5 shutdown they fixed all of the holes and cracks in  
6 the vessels?

7           A. They brought people in, and I don't know  
8 what was said, but I know they did the inspections  
9 and continued on doing their jobs to go on and say  
10 it was ready to go.

11          Q. Okay.

12          A. They said it was ready to go. Ready to  
13 go ahead and start back up.

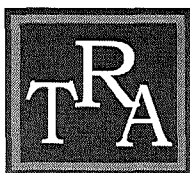
14          Q. Who said that?

15          A. That would be the engineers or the people  
16 that would have done the work.

17          Q. And I don't know who you are talking  
18 about.

19          A. And that would be the maintenance people  
20 who did the work, the engineers who were following  
21 up on the work, and I don't know exactly what they  
22 said as far as when it is time to do -- to go  
23 ahead and let's go ahead and get back and running.  
24 I was not in those conversations.

25          Q. Okay. Before we get to starting up



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 again, I'm trying to understand what they said  
2 about their repair efforts and whether they fixed  
3 all the cracks and holes or not?

4 A. I don't know that. I don't sit on those  
5 meetings.

6 Q. What is the first meeting you got brought  
7 into after the turnaround?

8 A. The morning meeting when everybody was  
9 talking about what is going to happen.

10 Q. That was like a Friday, October 25th, and  
11 they say we are about to crank up?

12 A. We sort of knew when we were going to  
13 crank up.

14 Q. How did you know?

15 A. It is common knowledge.

16 Q. What was your understanding of when you  
17 were going to crank up?

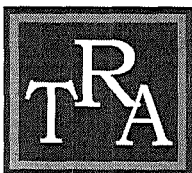
18 A. My understanding is it was going to  
19 happen on a weekend. That was my understanding.

20 Q. So --

21 A. Without any hiccups or anything like  
22 that.

23 Q. So Sunday, October 27 sounds like the  
24 time that you thought was the plan to start up?

25 A. It would have been around that weekend.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. So you were at a morning meeting leading  
2 up to that weekend?

3 A. Probably, yes.

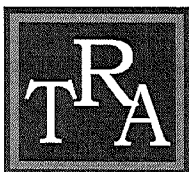
4 Q. What I'm trying to understand is: Was  
5 there any discussion about whether they knew or  
6 did not know that they had fixed all the holes and  
7 the cracks in the leaking vessels?

8 A. Not in that meeting. This was a  
9 general-knowledge meeting. The people that attend  
10 that meeting are the clerks, logistics people, the  
11 people that take care of the paperwork up front.  
12 Sort of a common-knowledge meeting, this is what  
13 is going on in the plant. It wasn't a specific  
14 maintenance meeting. It is all generalities in  
15 there to say we are working on this or working on  
16 that.

17 Q. Aside from that meet -- so nothing was  
18 said in that meeting about repairing the leaks?

19 A. No, they said we are going to try to  
20 start up. That is usually what the terminology  
21 is.

22 Q. Before the start-up weekend, were you  
23 advised or consulted about the status of the  
24 repair efforts on the HIP, the CIP, and the  
25 converter?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. They don't consult me on that.

2 Q. Did they tell you, you know, all is clear  
3 Mr. Health, Safety, and Environment guy, because  
4 we fixed every hole and crack in the equipment?

5 A. No.

6 Q. So nobody told you anything about the  
7 status of the repairs before that startup?

8 A. Well, just common knowledge about what I  
9 know about the site, my length of time being  
10 there, when they said it was time to start up,  
11 most of the time, all the work has been done.  
12 They don't start up until the work is done or they  
13 think is done.

14 Q. So you were just sort of hoping that that  
15 is how they were going to behave this time?

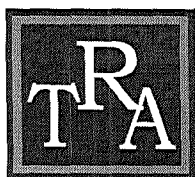
16 A. I don't know if it was hoping. The word  
17 "hope." I just knew that they said they were  
18 going to start up.

19 Q. Okay. And so nobody told you that they  
20 fixed all the cracks and holes before they started  
21 up?

22 A. No. They don't come to T.J. and say, "I  
23 fixed every one." No, they do not.

24 Q. Do you think they called Matt Barnes?

25 A. I doubt it.



**TORRES REPORTING & ASSOCIATES, INC.**

**COURT REPORTING & LITIGATION SERVICES**

**tra@torresreporting.com**  
**www.torresreporting.com**

**Baton Rouge, LA**  
**225.751.0732**  
**225.752.7308 FAX**

**New Orleans, LA**  
**504.392.4791**  
**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 Q. Do you think they called DEQ?

2 A. I doubt it.

3 Q. Did they ask for you to be there on the  
4 startup to try to make sure things were safe,  
5 healthy, and environmentally safe?

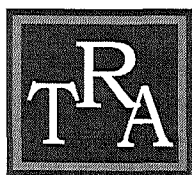
6 A. No.

7 Q. And were you there on October 27th when  
8 they started up?

9 A. No.

10 Q. Was anybody there on October 27th to  
11 assess whether the plant was leaking upon the  
12 startup?

13 A. I don't know who all was there the 27th.  
14 The operators that were in charge. I'm sure there  
15 were some leftover big contractors that were doing  
16 some work there. I think maybe Dan was there.  
17 That is probably who was there. I didn't get  
18 specifics about who was there, what their names  
19 were, but I'm sure there was a representative  
20 group, whether it was Dan, the operators,  
21 mechanics possibly, and leftover contractors on  
22 the site that would be just finishing up a few  
23 scaffoldings, that kind of thing. Everybody just  
24 doesn't walk out and say it is ready to go. It  
25 doesn't happen that way.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And the question was: Was there anybody  
2 there for the specific purpose of assessing  
3 whether the leaks had been -- whether there were  
4 going to be leaks when they were starting up?

5 A. The specific purpose, I don't know if  
6 anybody was specifically told that or not, that  
7 this is your job to go see if it is leaking. I  
8 don't know.

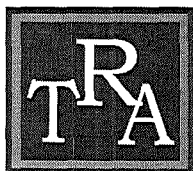
9 Q. So there was no one from your office or  
10 the safety, health, and environment person --

11 A. No. No. Just me. It was me and I was  
12 not there.

13 Q. And when you are not there, there is not  
14 somebody that takes your place to carry on your  
15 safety, health, and environment role?

16 A. It is a culture that they understand to  
17 take care of each other, okay. That is the  
18 culture of their safety rules in place. They are  
19 grown men. Nobody has to go out there and be the  
20 coach.

21 Q. I guess, from an environmental  
22 standpoint, there is nobody that, when you are not  
23 there at the Burnside plant, that takes your  
24 function of environmental coordinator and carries  
25 that role when you are not there?





1           A. I'm there on nights. I'm not there right  
2 now.

3           Q. And my question is --

4           A. No.

5           Q. -- is there someone that takes that spot?

6           A. No. There is nobody that says, "I've got  
7 T.J.'s job today." Nobody.

8           Q. If somebody was going to ask you to be  
9 there to see what happens on the startup from a  
10 environmental, safety, and health perspective, who  
11 would have had to ask you to be there that day?

12          A. It would be Dan or Tom or something like  
13 that, the production supervisor or somebody like  
14 that would have asked me.

15          Q. Okay. Are you on salary, or do you get  
16 paid overtime?

17          A. Salary.

18          Q. So it wouldn't have cost anything extra  
19 for you to be there on that Sunday at the plant?

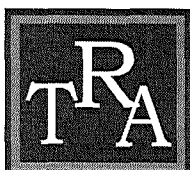
20          A. No, I doubt it.

21          Q. Is there still a safety, health, and  
22 environmental committee at Dupont?

23          A. Yes.

24          Q. And who is the chair person of that?

25          A. Teddy.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Teddy Monconduit?

2 A. Yes. That was Jeff's for a long time.

3 Q. It was Jeff Simoneaux's for a long time?

4 A. Yes, it was.

5 Q. And that committee meets and makes  
6 recommendations during the regular work  
7 operations?

8 A. There is like a once-a-month meeting.

9 Q. Okay. Did you ever have any problems  
10 with the way Jeff handled his role in the SHE  
11 committee?

12 A. Not really, no.

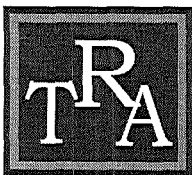
13 Q. Have you ever known any incidents where  
14 Jeff was dishonest?

15 A. Not to me, he wasn't.

16 Q. Do you know of any incidents of  
17 dishonesty?

18 A. I don't know of any event of dishonesty  
19 on Jeff's part, no, I do not.

20 Q. You mentioned a concern earlier about  
21 off-site impacts. Is there any equipment along  
22 the fence line, like a camera on the fence line or  
23 Draeger tube on the fence line, anything that  
24 would tell you when the gas crosses the fence  
25 line?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. No.

2 (Whereupon, the document referred to is  
3 marked as Exhibit No. 9 for identification.)

4 BY MS. BARNEY:

5 Q. I'll show you a document that is No. 345  
6 that we can mark as Exhibit 9.

7 A. This was when, this year?

8 Q. Yeah. Looks like July 5th.

9 A. 2013.

10 Q. Have you ever seen this document before  
11 that you know of?

12 A. No.

13 Q. When these initial incident reports get  
14 prepared, do you get a copy of them automatically?

15 A. I have access to them and they are  
16 actually communicated to the whole site most of  
17 the time and e-mail is -- Kelsey is the young  
18 lady's name now, but it is usually embedded in an  
19 e-mail and it's dumped on everybody. These are.

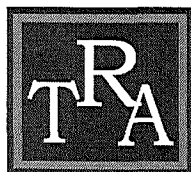
20 Q. So you would have gotten a copy of that?

21 A. Yeah. I wasn't there. I know where I  
22 was on 4th of July.

23 Q. Where was that?

24 A. Colorado.

25 Q. So when did you get back?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Somewhere around the 20th.

2 Q. When you got back, I guess you would have  
3 had an e-mail with this attached?

4 A. Probably. Yes.

5 Q. And then what would you do as the safety,  
6 health, and environmental coordinator once you got  
7 this report?

8 A. And on the 19th?

9 Q. Whenever you got back, yeah.

10 A. By the time I got back, I would have  
11 anticipated that it was noted and put in the work  
12 log. That would have been my guess. That is -- I  
13 don't go chasing -- I did not go and click on  
14 every one of those.

15 Q. Okay. So you may have not looked at it  
16 when you got back?

17 A. I don't think I did.

18 Q. If you were gone, who do you think filled  
19 out the environmental deviation NA section?

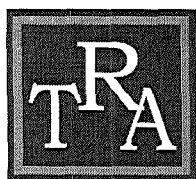
20 A. It was not me. It could have been Tom.

21 Q. Whenever that section is completed on the  
22 Burnside initial report, is it run by you?

23 A. The deviations, is it run by me?

24 Q. Yeah. Do they run this report --

25 A. I have access -- this report right here?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Uh-huh.

2 A. I have access to these.

3 Q. I understood that part. I'm talking  
4 about somebody is preparing the report and they  
5 are deciding whether to put yes, no, or  
6 inapplicable; do they run it by the environmental  
7 coordinator before they make that determination?

8 A. Sometimes.

9 Q. How many times have you been asked to  
10 speak to that issue on an initial incident report?

11 A. Not that many times.

12 Q. Can you ever think of a time where you  
13 were asked to?

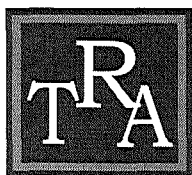
14 A. No.

15 Q. Have you ever seen an initial incident  
16 report that had a "yes" in the environmental  
17 deviation block?

18 A. I don't think so. I would have to go  
19 look and double-check.

20 Q. What would be the proper method for  
21 somebody to go through to determine whether to put  
22 a yes, no, or not applicable under the  
23 environmental deviation?

24 A. When that is calculated or done, there is  
25 a form that is -- it is either an ITS or one that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 there is a question and answer sheets that they go  
2 click on the buttons and do those numbers.

3 Q. Okay. So if -- the proper way to do it  
4 would be to do what you just described, go to that  
5 other form and fill it out, click on the numbers?

6 A. That is going to be my interpretation,  
7 yes.

8 Q. So if somebody came to you and -- the  
9 environmental person and they wanted help filling  
10 out the block on the initial incident report that  
11 says "environmental deviation," you would go to  
12 this other form?

13 A. Yes. We would discuss -- we would go to  
14 that form and question it.

15 Q. I'll show you a document. I'm not sure  
16 we're starting with the first page of the  
17 document, but maybe you can help me with that.

18 A. I think I'll take a five-minute break.

19 MS. WEINER:

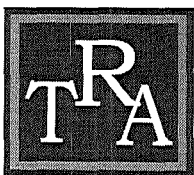
20 Absolutely.

21 (A brief recess.)

22 (Whereupon, the document referred to is  
23 marked as Exhibit No. 10 for identification.)

24 MS. BARNEY:

25 We're going to mark this as



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Exhibit 10 and it is Bates No. 1 through 23.

2 BY MS. BARNEY:

3 Q. A second ago, you were talking about if  
4 somebody came to you and they wanted you to help  
5 them do the block that is called environmental  
6 deviation on the initial incident report. There  
7 is another form that you can use to calculate the  
8 answer to that question, I think is what you were  
9 saying. And so I've just shown you a document  
10 that I've marked as Exhibit 10, Bates No. 1  
11 through 23, and I'd ask you to look at these.  
12 These are called incident investigation reports?

13 A. Uh-huh.

14 Q. Is this the form you were talking about  
15 that you could fill out to reach that conclusion?

16 A. Yes. This is it.

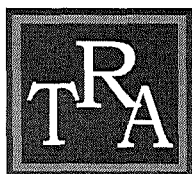
17 Q. Okay. I wanted to flip through and see  
18 if there was one for the July 2012 date, July 5th,  
19 and 7th, I think it was. 4th, 5th and 7th of  
20 2012.

21 MS. WEINER:

22 Is there a question on the table?

23 BY MS. BARNEY:

24 Q. Do you see one of these investigation  
25 reports dated July --



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. The 4th.

2 Q. -- 4th, 5th, and 7th to correspond with  
3 Exhibit 9, the initial incident report?

4 A. If these are in chronological order, no.

5 Q. They are not. So you have to flip  
6 through. I started to do that, but I left them in  
7 Bates number order. I see one from May 24, 2012  
8 and June 11, 2012.

9 You don't see one?

10 A. No.

11 Q. But this is the type of report I think  
12 you said that would be used?

13 A. I would think so.

14 Q. Who fills out these Burnside Incident  
15 Investigation Reports if they are filled out?

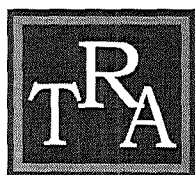
16 A. I think you will see on the back of some  
17 of these, if you follow them down the pathway sort  
18 of where the workflow is, there is a workflow page  
19 about three pages in the document.

20 Q. Down at the bottom where it stays  
21 "status/edit tracking"?

22 A. It says "workflow status."

23 Q. Okay.

24 A. That is the group that I saw on that  
25 particular one, these are the ones that looked at



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 it.

2 Q. So if you look at Bates No. 9, DSF09,  
3 March 2012, that one is March 2012, it's got  
4 status/edit tracking, Thomas Miller, Kerry Long,  
5 Gene Clemons, but it's got Tom Miller for Kerry  
6 Long, Gene Clemons; do you know what that means?

7 A. No, I do not know what "for" means.

8 Q. Have you ever been involved in filling  
9 out one of these?

10 A. Yes.

11 Q. All right. Do you see in this group any  
12 of the ones that you participated in filling out?

13 A. No, did not.

14 Q. You do not?

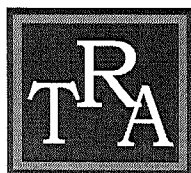
15 A. No.

16 Q. The last one I think we have in here is  
17 for June 12th, 2012 -- June 11, 2012, Bates No. 15  
18 through 17 -- strike that -- 15 through 19. And  
19 it shows Tom Miller preparing that.

20 So if you participate in filling  
21 one of these out, do you keep it in your file?

22 A. One of these, no, you can go to this  
23 database.

24 Q. So this is available on-line to anybody  
25 at Dupont?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. If you have -- it is available in a Lotus  
2 Notes Database. You have to go to a certain icon  
3 and click on it and that is where that is derived  
4 from.

5           Q. So you think you filled out some of these  
6 since you -- since when?

7           A. I think I filled out one maybe.

8           Q. And would that have been since  
9 January 2013 when you took over the environmental  
10 role?

11          A. I would think so, yes.

12           MS. BARNEY:

13                   We apparently don't have any of  
14 these, Monique, since June of 2012, so for the  
15 last year and a quarter, I guess.  
16 Year-and-a-half.

17           MS. WEINER:

18                   I'll look to see if there are any.

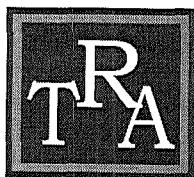
19           MS. BARNEY:

20                   Okay.

21          BY MS. BARNEY:

22           Q. Would you have filled one out when there  
23 as an explosion and two welders were hurt?

24           A. No. That incident investigation was done  
25 above my head. That was a big one.



1 Q. So that is not the report you were  
2 thinking about?

3 A. No.

4 Q. Okay. So none of the reports that we  
5 have in here were reports that you were involved  
6 in preparing?

7 A. I don't know what is all in there.  
8 In these?

9 Q. Yeah. In 1 through 23, Bates numbers.

10 A. No. They go back as far as 2011 so, no.

11 Q. And you think you have done one since  
12 January?

13 A. Yes.

14 Q. Before January 2013, would you have been  
15 involved in preparing an incident investigation  
16 report for the site?

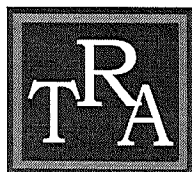
17 A. No.

18 Q. If you look at -- let's just take the  
19 most recent -- I'm sorry, look at Bates No. 20, if  
20 you would.

21 A. (Complies with request.)

22 Q. At the bottom of Page 20, there is some  
23 reportable quantity information right there. You  
24 were talking about reportable quantities earlier.

25 Is this reportable quantities that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 is the information that you are familiar with that  
2 you were referring to earlier?

3 A. No.

4 Q. Okay. What is different about this than  
5 what you were referring to earlier?

6 A. What I'm familiar with is what's DOT  
7 regulated, which is the same thing as Coast Guard  
8 regulations, would be the 100 pounds for SO3,  
9 those type of -- nothing -- I am not familiar with  
10 how these actual blocks are calculated, these  
11 numbers. I'm not familiar with -- it says,  
12 "Release measured in one-hour blocks," and I don't  
13 know what these calculations mean or how they're  
14 derived.

15 Q. And you are referring to Page 20?

16 A. Yes, I'm looking at that.

17 Q. Is what I asked you to do.

18 A. Yes.

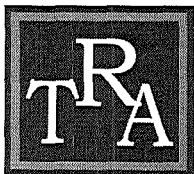
19 Q. So you are not familiar with these  
20 reportable quantities that are on Page 20?

21 A. No.

22 Q. Has anybody shown you those before?

23 A. No.

24 Q. Okay. As of 2013, when you took over the  
25 environmental role, are the operators supposed to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 call you if they are concerned about a gas leak at  
2 night?

3 A. They basically -- most of the time, they  
4 call supervision.

5 Q. So you are not really somebody on the  
6 list that they are supposed to call?

7 A. No, I would not be. Maybe fourth or  
8 something like that.

9 Q. Okay.

10 A. They would probably call their immediate  
11 supervisor.

12 Q. Okay. What order to get to you is number  
13 four; I know that is an estimate, but --

14 A. I would think it would have to be about  
15 four or five people not at home, which would be  
16 very rare.

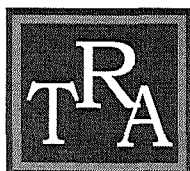
17 Q. So they probably get to Tom Miller before  
18 they get to you?

19 A. Probably, yes.

20 (Whereupon, the document referred to is  
21 marked as Exhibit No. 11 for identification.)

22 BY MS. BARNEY:

23 Q. Let me show you a document that we'll  
24 mark as Exhibit 11. It is also previously marked  
25 as Exhibit B to the complaint and ask if you have



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 seen that document before?

2 A. Yes.

3 Q. And what is that document?

4 A. This is the learning manager PowerPoint  
5 that's -- that the guys get assigned to every so  
6 many -- like once a year.

7 Q. Okay.

8 A. That is -- the learning manager is a  
9 delivery system for these type of things.

10 Q. Is anything else done with this document  
11 other than that?

12 A. What do you mean?

13 Q. It is just a training module?

14 A. It is a training module. TLM is called  
15 "The Learning Manager" and it is a training  
16 module.

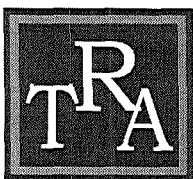
17 Q. And what is it training them on?

18 A. This one, it is an overview of the  
19 general awareness of the TSCA rules.

20 Q. Okay. Is this the only time that you  
21 know of that employees are -- that TSCA is  
22 discussed with employees at DuPont is in this  
23 annual training module?

24 A. Yes.

25 Q. In here, I believe there -- the module



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 directs you to or directs people to a form. Are  
2 you familiar with any form --

3 A. What page is that?

4 Q. -- that is supposed to be filled out by  
5 Dupont personnel for TSCA purposes?

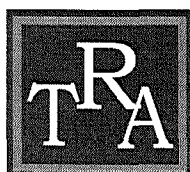
6 A. There is a portal now they can go to and  
7 do what they need to do to initiate that. I don't  
8 think -- that's pretty recent, that portal they  
9 can go to to do this.

10 Q. Are you the person that would guide the  
11 employee on the right way to complete a TSCA  
12 notification form?

13 A. We would work together to get the right  
14 answers. That would be the way I would do it.  
15 Don't have the answer for everything, but if we  
16 don't know, we would ask.

17 Q. Okay. So if somebody didn't use the  
18 right form or needed help complying with their  
19 responsibilities under TSCA, you would be the  
20 person to direct them to the TSCA --

21 A. If they were asked and they wanted to  
22 come and ask me, yes, we would start that process  
23 on trying to figure out how they wanted to do it.  
24 And we would go start chasing down the right  
25 people to get the form filled out.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Nothing in here refers to anything called  
2 a first report or an initial incident report?

3 A. Not in this one, no.

4 Q. Okay.

5 A. This is a corporate document, by the way.

6 Q. All right. And to comply with this  
7 requires preparing a written document, putting  
8 something in writing, right? In order to fill out  
9 the form that this directs an employee to fill  
10 out, it requires putting something in writing?

11 A. I think so, yes.

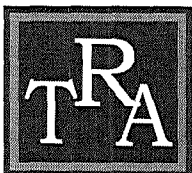
12 Q. If an employee fills out an initial  
13 incident report about a gas leak, does somebody  
14 else at DuPont then take that information from the  
15 initial incident report and fill out the proper  
16 form for TSCA?

17 A. No.

18 Q. Does anything in Exhibit 11 talk about a  
19 reportable quantity?

20 A. Not that I'm aware of. I don't know this  
21 line for line but not that I'm aware of.

22 Q. Other than Leo Scott, and we talked about  
23 his contention, that he was physically impacted by  
24 the gas, do you know of anybody else at Dupont who  
25 has been physically injured by gas exposure since



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 December 2011?

2 A. I don't think so. Leo would have been  
3 the one that I have known about.

4 Q. Okay. What about, do you recall anything  
5 about a truck driver? Does that ring a bell,  
6 maybe being exposed to gas when he was loading the  
7 railcars? He was loading trucks, sorry.

8 A. A truck driver that was exposed, no, I do  
9 not.

10 Q. Okay.

11 A. I have communication with those folks. I  
12 think I might have been notified from a trucking  
13 company, I think.

14 Q. But you don't recall that happening?

15 A. I don't recall that happening.

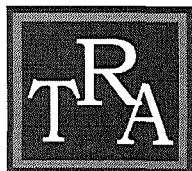
16 Q. Is it anybody's job at DuPont Burnside to  
17 monitor the stack opacity visibly?

18 A. The operators do that.

19 Q. And any operator can do that?

20 A. There is a training that they take that,  
21 what is called the smoke school, for lack of a  
22 better term. It is a company called Whitlow.  
23 That is the company we use now. And that would be  
24 some of the training they would get.

25 (Whereupon, the document referred to is



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 marked as Exhibit No. 12 for identification.)

2 BY MS. BARNEY:

3 Q. I'll show you a document that we will  
4 mark as Exhibit 12. This is entitled S13V,  
5 Environmental Deviations, Bates Nos. --

6 A. DSF0000267.

7 Q. Okay. And what is the last page, if you  
8 don't mind?

9 A. Four zeros and 314.

10 Q. Does this look like the current version  
11 of S13V corporate standard?

12 A. By just looking at this document right  
13 now and the affirmation date, I would say yes. It  
14 is 2012. It is a pretty recent document, it looks  
15 like.

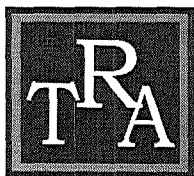
16 Q. And this is an internally-created DuPont  
17 document?

18 A. Corporate.

19 Q. Corporate. Okay.

20 Is this what generates -- is this  
21 information the same information that goes into  
22 the incident investigation report we're looking at  
23 earlier, the points?

24 A. This information, I don't know exactly  
25 what this information tells.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Since you have taken over in  
2 January 2013, have you had to use this to  
3 calculate any --

4 A. I haven't used this.

5 MS. WEINER:

6 Did you intend to attach the other  
7 S8Y standard behind?

8 MS. BARNEY:

9 No. Is it back there?

10 MS. WEINER:

11 S13V is a smaller group of  
12 documents.

13 THE WITNESS:

14 That number I gave you with the  
15 367, that was other standards. I didn't look  
16 through the whole document.

17 MS. BARNEY:

18 Sorry. So Exhibit 12 is going to  
19 be 267 to --

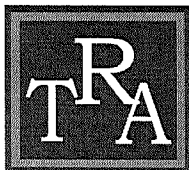
20 MS. WEINER:

21 271 is what it should be.

22 MS. BARNEY:

23 271. And let's make Exhibit 13 273  
24 to 314.

25 (Whereupon, the document referred to is



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 marked as Exhibit No. 13 for identification.)

2 BY MS. BARNEY:

3 Q. The one we marked S8Y Safety, Process  
4 Safety, Fire Distribution, Environmental Incident  
5 Classification and Reporting, is that the current  
6 version of that standard at DuPont that you know  
7 of?

8 A. It looks pretty close to me.

9 Q. And this would be the current one back to  
10 January 2012, I guess? It says "reaffirmed  
11 January 2012."

12 A. I'm thinking it would be, but I can't  
13 tell you if that is the exact document or not  
14 because this was pulled off the corporate website.  
15 But just looking at this, I see this was a close  
16 one.

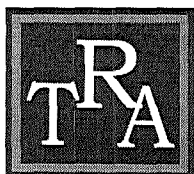
17 Q. Well, actually, let me let you look at  
18 this one which is number -- Bates No. 24 through  
19 65. It might be a slightly different version and  
20 we'll mark that as Exhibit 14.

21 A. Because this was updated in  
22 September 2013, so this was updated therefore...

23 Q. So we'll mark Bates No. 24 --

24 A. I'm assuming.

25 Q. -- as Exhibit 14.



**TORRES REPORTING & ASSOCIATES, INC.**

**COURT REPORTING & LITIGATION SERVICES**

**tra@torresreporting.com**  
**www.torresreporting.com**

**Baton Rouge, LA**  
**225.751.0732**  
**225.752.7308 FAX**

**New Orleans, LA**  
**504.392.4791**  
**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 (Whereupon, the document referred to is  
2 marked as Exhibit No. 14 for identification.)

3 BY MS. BARNEY:

4 Q. Since you've been in your environmental  
5 job at Dupont, have you used either one of these  
6 documents: Exhibit 12, 13, or 14 to make any  
7 determinations in connection with the gas leaks  
8 from the HIP, the CIP, and the converter?

9 A. No, I have not.

10 Q. Do you know whether anybody has?

11 A. These are linked, if I'm not mistaken, I  
12 think these are linked on that -- you have  
13 references to these and they are in the actual  
14 incident.

15 Q. Investigation report --

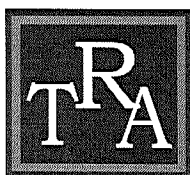
16 A. Yes.

17 Q. -- that we saw earlier? Okay.

18 A. Because they categorize them here and I  
19 think they are reported in there.

20 Q. Do we have the one that was in effect  
21 December 2011? Apparently not.

22 A. I can't tell you. I don't know if they  
23 archive those. There is not a book with any of  
24 these around. We go straight to the intranet for  
25 these. I couldn't say.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. We got on to all of that, we were talking  
2 about the shutdowns and repairs. And I believe  
3 you said leading up to the shutdown, you weren't  
4 -- leading up to the crank-up, startup again, you  
5 weren't really involved or told about what the  
6 status of the repairs was?

7 A. From my perspective and due to my  
8 experience from being there --

9 Q. I heard -- I'm just talking about your  
10 direct knowledge.

11 A. No. They didn't tell me Crack 6 was  
12 fixed.

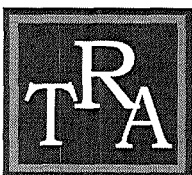
13 Q. And they didn't tell you all the cracks  
14 and holes were fixed?

15 A. I did not get that -- they did not say  
16 all of them were, but when they started up, it was  
17 my interpretation that the repairs had been made  
18 and it was time to start up.

19 Q. Okay. You assumed that because they were  
20 going to start up, they must have fixed  
21 everything?

22 A. I was thinking when it was time, it was  
23 time.

24 Q. Do you know why they never took a  
25 shutdown before the regularly-scheduled shutdown



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 in order to address the leaks?

2 A. They took some shutdowns.

3 Q. Hot shutdowns that lasted maybe a day?

4 A. That is about what they last. I don't  
5 know how many they took, but I know we took some.

6 Q. Do you have any idea why they didn't take  
7 a cold shutdown before the regularly-scheduled  
8 turnaround?

9 A. No.

10 Q. Nobody has told you that it was because  
11 they had customer demands and they didn't want to  
12 lose money from the sales?

13 A. I didn't hear anything about that. I'm  
14 not saying that's not what happened, but I didn't  
15 hear that.

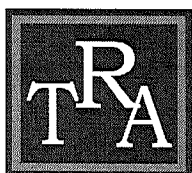
16 Q. So when they started up on October 27th,  
17 did they have the hoses and the boxes and the  
18 vacuum system attached to the converter, the CIP,  
19 and the HIP --

20 A. I didn't walk out there and look. I  
21 don't know.

22 Q. -- on Sunday?

23 A. No, I was not there on Sunday.

24 Q. So you don't know whether when they  
25 started back up, they had the hoses attached?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. I said I don't know.

2 Q. When you came in Monday, October 28th,  
3 did you go to work that day?

4 A. Yes. Yes, I did.

5 Q. Were the hoses attached at that point?

6 A. I don't know. I didn't walk out there  
7 and look.

8 Q. Nobody asked the safety, health, and  
9 environmental person to go look at the equipment  
10 that had been leaking for a year-and-a-half prior  
11 to the shutdown --

12 A. Nobody asked me.

13 Q. -- to see if it was still leaking after  
14 the startup?

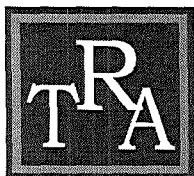
15 A. Nobody did. If there would have been  
16 some leaking going on, I would have known about  
17 it. I would have been told or there would have  
18 been some knowledge of it. Nobody asked me to  
19 specifically go walk out there.

20 Q. So you were not aware of any leaks that  
21 might have occurred on the night of October 27th?

22 A. October 27th?

23 Q. The day they cranked up on a Sunday?

24 A. I was made aware -- is that the day that  
25 I was getting calls, I think there was a call that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 night on the 27th. I would have to go look at my

2 --

3 Q. Yeah, I think --

4 A. Can I look back at these --

5 Q. Sure.

6 A. -- to refresh my memory?

7 Q. Sure.

8 A. This particular one, this one right here,  
9 yes. I was aware of that one (indicating), this  
10 one.

11 Q. Which document are you referring to?

12 A. The only reason I went to this is because  
13 I know this was in my hand. That was a Monday,  
14 wasn't it, on the 28th, yes.

15 MS. WEINER:

16 He is looking at the LDEQ form.

17 THE WITNESS:

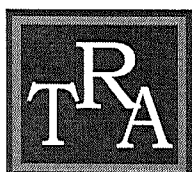
18 Because this is one of the people  
19 we talked to about it.

20 BY MS. BARNEY:

21 Q. You are referring to Bates No. 1014 at  
22 the bottom?

23 A. Yes.

24 Q. That is a November 8, 2013 field  
25 interview form from LDEQ?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. Yes. I'm going to go back. I was aware  
2 of what happened when we started -- when I started  
3 hearing things, so I went in the control room and  
4 looked in the logbook. There is a logbook. I  
5 don't remember who filled it out. I made a copy  
6 of that page in the logbook and actually gave it  
7 to these guys. I handed it to them.

8           Q. To the DEQ?

9           A. Yes, I did.

10          Q. So you made a copy of the operator's  
11 logbook that is in the control room?

12          A. Yes.

13          Q. And handed it to the DEQ folks on  
14 November 8th?

15          A. No. Yeah, November 8th. That is when  
16 they came inquiring.

17          Q. Is that the first time you made any  
18 inquiry or had any discussions about a leak on  
19 October 27th?

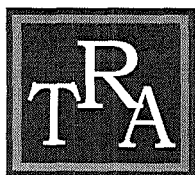
20          A. No.

21          Q. When was the first time?

22          A. The morning of the 28th. I got a call  
23 from Steve Long with the Louisiana State Police.

24          Q. And he spoke with you?

25          A. Yes.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And what did he say?

2 A. He was following up on the call that  
3 eventually got to him as a result of, I guess, the  
4 complaint or however that flow of information  
5 goes, it ended up to him, so he called me and  
6 asked me the particulars. I gave him what I knew  
7 at that moment.

8 Q. And what was that?

9 A. That is what I read in the logbook that I  
10 handed to the DEQ.

11 Q. What was in the logbook? I don't think  
12 we have a copy of that.

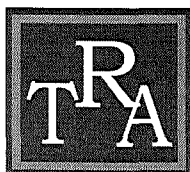
13 A. It was no -- the word off-site impact was  
14 in there, I know that. I can't quote it verbatim,  
15 but there was -- I did make a copy of the page  
16 just so I would have that in case somebody -- I  
17 just kept it.

18 If you get a call from the State  
19 Police, that is what I decided to do was to start  
20 chasing stuff down at that point to make sure.

21 MS. BARNEY:

22 Okay. And I guess we e-mailed  
23 about the logbooks. We don't have anything after,  
24 I forget when, but I put it in an e-mail.

25 BY MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And do you recall what it said? It said  
2 there was a leak?

3 A. Yes. But for me to quote it right now, I  
4 don't think I can give you the right quote. All I  
5 know is there was no off-site impact or did not  
6 leave site or something like that. And I don't  
7 even remember who wrote it. I couldn't tell you  
8 the operator who wrote it.

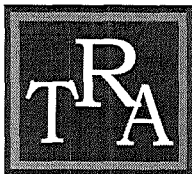
9 Q. What did you do then after you checked  
10 the logbook? I'm sorry, you were on the phone  
11 with the State Police and you went and got the  
12 logbook; how did that work?

13 A. I went looked at it post.

14 Q. What did you tell him on the call?

15 A. He said he was following up on it. He  
16 had to do this. And as far as he knew, there was  
17 nothing off-site that he knew of. This is the  
18 trooper telling me this. And then he said, "I'll  
19 continue following up on it. I might need some  
20 more information." That kind of conversation. I  
21 think it was a result of a 9-1-1 call, is the  
22 reason he got involved.

23 Q. Okay. And just for the record, you may  
24 or may not know, Mr. Simoneaux testified yesterday  
25 that he went to -- near the plant outside the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 plant on October 27th, Sunday night, and I believe  
2 the testimony is that there was a very significant  
3 gas leak that was leaving the site and he did call  
4 9-1-1.

5 A. Okay.

6 Q. So nothing in the papers you saw at  
7 DuPont documented that there was a leak leaving  
8 the site that night; is that right?

9 A. That's what I gave to the people.

10 Q. The logbook?

11 A. That one page.

12 Q. And you think it says that nothing was  
13 leaving the site?

14 A. I'm thinking it says that, but I'm not  
15 verbatim, but I did hand what I had to those guys.

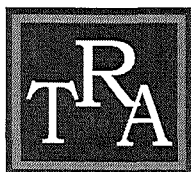
16 Q. Have you seen any video from  
17 October 27th?

18 A. I didn't look at any video. Again, it  
19 was tough enough.

20 Q. Did you look at Camera 13 when you went  
21 to the control room on October 28th; did you look  
22 at the Camera 13 recording from the night before  
23 to see what the leak looked like?

24 A. No, I did not.

25 Q. Any particular reason why?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. No. I never go -- those cameras, I  
2 usually consider them as security pieces, most of  
3 the time, and I did not go back and look. I  
4 believed what I heard from the people who told me  
5 so I did not.

6           Q. Tell me exactly what you heard.

7           A. I wrote what was written down. I believe  
8 the statement that was written down.

9           Q. What did it say?

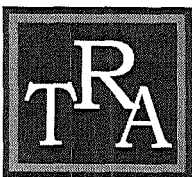
10          A. I would have to go back and double-check  
11 and look. I had enough confidence in the  
12 statement to hand it to the DEQ, and that is what  
13 I did.

14          Q. But you don't know who wrote it or what  
15 it says?

16          A. I would have to go look. It was one of  
17 the night operators. I don't know who was on that  
18 night. I typically don't accuse people of not  
19 writing down what they usually write down. I'm  
20 not saying they are not saying the truth. There  
21 was no reason for me to go follow-up on anything  
22 like that.

23          Q. So the document said there was a leak on  
24 October 27th?

25          A. Yes. It said that.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Did it say anything about the size of the  
2 leak?

3 A. No. I don't think so.

4 Q. Okay. Did it say anything about the  
5 environmental deviation, yes, no, not applicable?

6 A. No, not on what I saw.

7 Q. What did you see? You just saw the  
8 logbook?

9 A. I saw the logbook, the blurb in the  
10 logbook.

11 Q. Have you seen an initial incident report  
12 for October 27th?

13 A. I don't know if I -- I'm trying to think  
14 if I have. I think there was one written. Yes,  
15 there was one written. I think it was written by  
16 Elizabeth. I saw it that morning.

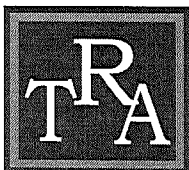
17 Q. And Elizabeth wasn't there on  
18 October 27th, right?

19 A. I don't think so.

20 Q. Do you know why she wrote the incident  
21 report?

22 A. I think somebody told her and she  
23 basically did it, did the report because somebody  
24 needed to.

25 Q. Have you seen an incident investigation



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 report for October 27th?

2 A. I think it is in process right now, if  
3 I'm not mistaken.

4 Q. And who is working on that?

5 A. I would assume that Tom is.

6 Q. And Tom has access to Camera 13 if he  
7 wanted to look at that?

8 A. He would have to do what I did.

9 Q. Which is what?

10 A. Call somebody and one of the technicians  
11 would get the information and pull it out of the  
12 system. The DVR system is what I had to do when  
13 it was requested, is what I called a technician  
14 in, and they went and retrieved the data from me.

15 Q. So when we recently made a document  
16 request for the recordings on Camera 13, that is  
17 what you are referring to?

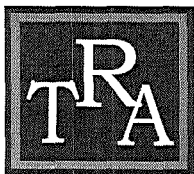
18 A. Yes.

19 Q. After October 27th, did you go over to  
20 Impala to talk to any of those folks about whether  
21 they encountered any gas on the night of  
22 October 27th?

23 A. No.

24 Q. Any particular reason why?

25 A. They called me.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. Who called you?

2 A. Impala.

3 Q. Who called you from --

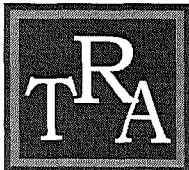
4 A. Mr. Darren Johnson. I think that is his  
5 name. First time I was talking to him.

6 Q. And what did he --

7 A. He did not call me that day. He called  
8 me on a Friday and told me that some guards were  
9 complaining that Friday of their eyes watering and  
10 that type of thing. I asked Darren, Mr. Johnson,  
11 "What are we doing with them?" He said, "We are  
12 sending them to their company's occupational  
13 health folks," which was Lofton -- I think Lofton  
14 Staffing was the group that had the guard force  
15 there at Impala. I said, "Okay. When you hear  
16 something, let me know and we'll get together on  
17 Monday."

18 So I invited him to the plant on  
19 Monday to sit down and talk. I called  
20 Mr. Johnson, I think, I called him Monday and  
21 said, "Do we have a report?" He said "No. They  
22 have not been to the doctor yet."

23 Okay. We are a week out now. So  
24 Tuesday, I called back, and they still have not  
25 gone to the doctor. He said he handed it off to



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 the Lofton Staffing people and it was a gentleman  
2 named Mingo, Fred Mingo is what sticks out, and I  
3 sent that gentleman an MSDS for sulfur trioxide.  
4 Never heard from him again.

5 Mr. Johnson and I, that was the  
6 last time we talked. He told me some things that  
7 went on that night and I said okay. And that was  
8 our last conversation that I had.

9 Q. Okay. What did he tell you about some  
10 things that went on?

11 A. He told me that he ran Jeff off for  
12 taking pictures.

13 Q. This was Darren Johnson?

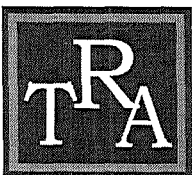
14 A. This was somebody with the Impala people,  
15 that is what I was told.

16 Q. Darren Johnson said he personally --

17 A. I don't know if he personally did. When  
18 he said "we," he may have meant the site. I don't  
19 know who the "we" entails, but I know, what I was  
20 told, and I didn't ask these questions, I was told  
21 this, that Jeff was told -- was caught trying to  
22 take pictures while he was on their property and  
23 they asked him to leave. I was told that.

24 Q. Okay.

25 A. I didn't pursue that. I went, "Okay."



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX  
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Did you try to talk to the guards who  
2 claim to be injured?

3 A. I cannot. I was waiting for -- to get  
4 the report back. You typically just don't go  
5 digging into somebody else's business at the point  
6 -- once they have taken it over. And I was  
7 waiting on their report to come to me and I did  
8 make a good faith contact with those folks and  
9 never heard from them again.

10 Q. Okay. Have you spoken with anybody else  
11 at Impala?

12 A. Since then, no.

13 Q. Or at all, other than Darren Johnson?

14 A. No. Not at Impala.

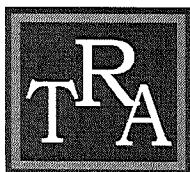
15 Q. And you talked to Mr. Mingo at Lofton?

16 A. Yes. And that was one conversation --  
17 and he wanted an MSDS and I sent it to him. I  
18 never heard back from him and now we are working  
19 on it a week later. I didn't hear anything from  
20 Impala or Mingo, so I didn't -- I just, at that  
21 point, I was waiting on them to call me.

22 Q. So you still haven't heard back from  
23 them?

24 A. No, I have not.

25 MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 I guess, just because I have been  
2 meaning to supplement, Monique, I'll take this  
3 opportunity because we have been doing a lot of  
4 work on this case and I haven't gotten to do a  
5 supplemental but I'll do it now: Darren Johnson,  
6 Gene Gilbert, Cullpepper.

7 MS. WEINER:

8 Gene Gilbert?

9 MS. BARNEY:

10 Last name Cullpepper. He is at  
11 Impala. He is a supervisor that is there at the  
12 time Jeff was not asked to leave.

13 Benjamin Paine and Natasha, last  
14 name, I'll have to get for you.

15 MS. WEINER:

16 So Darren Johnson, Benjamin Paine,  
17 somebody Cullpepper, Natasha.

18 Those are all Impala employees?

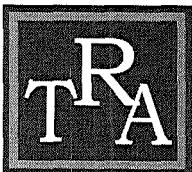
19 MS. BARNEY:

20 They are the guards that were out  
21 there.

22 MS. WEINER:

23 And you don't have the full names  
24 for Cullpepper and Natasha?

25 MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 I'll get them for you. But we've  
2 talked about this on our meet and confer and I  
3 told you I was supplementing the witnesses and I  
4 just, since our meet and confer, I haven't had a  
5 chance to do it, so I'm giving you what I can  
6 without my documents in front of me.

7 MS. WEINER:

8 Okay.

9 BY MS. BARNEY:

10 Q. Have you been asked to do any  
11 quantification of the leak on October 27th?

12 A. No.

13 Q. Do you know if anybody has been working  
14 on that?

15 A. I don't know right now.

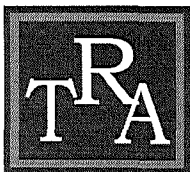
16 Q. Do you know whether or not hoses were  
17 installed after October 27th?

18 A. No.

19 Q. You don't know, today, whether the hoses  
20 are up there?

21 A. I don't know.

22 Q. Is there, as the safety, health, and  
23 environmental person at DuPont Burnside, is there  
24 any regular schedule for you to go around and look  
25 at the plant and the equipment that has been



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 leaking for a year-and-a-half?

2 A. I walk around the plant. My concern is  
3 mostly on some of the procedural stuff. I do walk  
4 around. I get information if something happens,  
5 but I go about out once a day. And that is about  
6 it. I don't stay out there.

7 Q. Any particular reason why?

8 A. Why I don't stay out there?

9 Q. Why you just go once a day?

10 A. I have other things to do and part of  
11 that is I go observe and I come back in.

12 Q. All right. So you don't know, right now,  
13 whether there are black plastic hoses attached to  
14 the HIP, the CIP, and the converter or not?

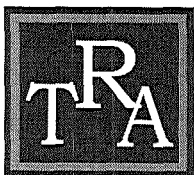
15 A. I don't know.

16 Q. You don't know whether there have been  
17 black plastic hoses attached to the HIP, the CIP,  
18 and the converter since October 27th?

19 A. I don't know that, either. I would have  
20 to go look.

21 Q. Have you since learned after the  
22 turnaround and after the startup that all of the  
23 holes and cracks in the leaking equipment were not  
24 fixed during the turnaround?

25 A. Yes. There were some repairs that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 continue that needed to be done.

2 Q. So all the holes and cracks in the  
3 leaking vessels were not fixed during the  
4 turnaround, right?

5 A. That is what it sounds like.

6 Q. Who did you hear that from?

7 A. That was some of the discussion that they  
8 were talking about, having to -- I think they had  
9 to go back down with the plant, one more down to  
10 do some additional work.

11 Q. All right. And that was like the next  
12 day?

13 A. That was probably Tuesday or Wednesday,  
14 something like that.

15 Q. After the police called?

16 A. I think so, yes.

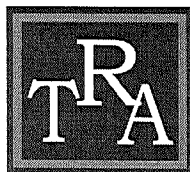
17 Q. All right. Other than that day or two  
18 after the police called, have they shut down again  
19 to do any more work?

20 A. I don't think so.

21 Q. Do you know whether, today, all the holes  
22 and cracks in the leaking vessels have been fixed?

23 A. I don't know that.

24 Q. Whose job is it to know that at DuPont  
25 Burnside?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. If every hole and crack was fixed, there  
2 would be an awareness by the maintenance or the  
3 maintenance lead would know what needed to be  
4 done. Now every hole and crack fixed, I don't  
5 know if -- I don't know if you can say that or not  
6 because something, like we said before, you can't  
7 see those things because they are internal.

8           Q. So as you sit here, you don't know  
9 whether there is an SO3 gas leak still going on at  
10 the Dupont Burnside plant or not?

11          A. I don't know.

12          Q. As of the last time you were at the  
13 plant --

14          A. Yesterday, I'm not aware of it.

15          Q. You don't know one way or the other?

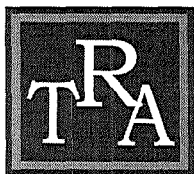
16          A. I haven't heard of one as of yesterday,  
17 no.

18          Q. One that somebody could see, right?

19          A. Precisely.

20          Q. And I guess my question is: As the  
21 health, safety, and environmental coordinator for  
22 Dupont Burnside, have you been provided  
23 information that all of the sources for leaks that  
24 one could see have been fixed?

25          A. I heard after the initial shutdown and I



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



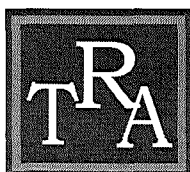
1 think the next shutdown to try to do another  
2 repair, that they were repaired as well as they  
3 could be repaired, and that is what I heard. That  
4 is about -- and I really don't need to understand  
5 where they are coming from because when they say  
6 HIP and CIP, I sort of know when they discuss  
7 that. But that is my understanding of when they  
8 go back to fix something, that is what they did  
9 that day and they came back up with a plan.

10 Q. So they just said that they did the best  
11 that they could?

12 A. That is my interpretation of it. I'm not  
13 saying they said that. That is just my  
14 interpretation for maintenance. They go in and  
15 fix something, do what they can do, make the  
16 repairs, and then start it back up.

17 Q. And that sounds a lot like the way it was  
18 before the turnaround, right? Lonnie and his guys  
19 would go out and they would adjust the holes, weld  
20 some holes and cracks and then they'd see what  
21 happens when operations kept going, right?

22 A. I don't like you to put words in my  
23 mouth, but there was a consistent effort to try to  
24 alleviate that need for the hoses, as stated with  
25 the hot shutdowns, and they were constantly



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 working on that. It was not just something that  
2 sat there. It was being worked on.

3 Q. And my question was: Is that still the  
4 case today?

5 A. Not that I know of today.

6 Q. You don't know if they are still working?

7 A. I don't know if they are working on them  
8 or not today. I really don't know because I  
9 haven't been there. I did not look yesterday. I  
10 don't keep up with every piece of maintenance out  
11 there.

12 Q. What i think what I'm hearing you say is  
13 that you do not know whether all the holes and  
14 cracks in the leaking vessels have been fixed?

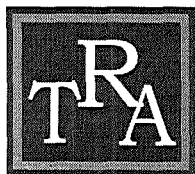
15 A. I do not know.

16 Q. Okay. There was some references on, I  
17 think it is the investigational report, the  
18 incident investigation report, about releases from  
19 primary containment and secondary containment?

20 A. Yeah.

21 Q. In the context of the gas leaks from the  
22 HIP and the CIP, is it your understanding that the  
23 primary containment is the vessels, the HIP, the  
24 CIP, and the converter?

25 A. I don't know that we call it primary



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 containment. When I see these, this is more  
2 towards curbing for liquid leak or something like  
3 that. That is what I consider when I see where  
4 those numbers were, they were floating. That is  
5 what I consider containment.

6 Q. So in connection with the gas leaks from  
7 the HIP and the CIP and the converter, what do you  
8 see it?

9 A. I don't know if that is what is called  
10 containment.

11 Q. So those words, in your mind, they are  
12 just not applicable?

13 A. It is part of the ductwork. It is not  
14 geared to be containment. They don't call it  
15 containment; they call it the piping.

16 Q. So it is the equipment?

17 A. Right.

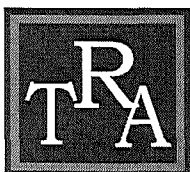
18 Q. Not containment?

19 A. Right.

20 Q. In your mind?

21 A. In my mind.

22 Q. You have no information that would tell  
23 you that on any particular day since December 21  
24 2011, there has not been SO3 gas leaking from  
25 DuPont Burnside?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 MS. WEINER:

2 Objection.

3 BY MS. BARNEY:

4 Q. Other than during the shutdown; is that  
5 right?

6 MS. WEINER:

7 Objection. Asked and answered.

8 THE WITNESS:

9 Say that again.

10 BY MS. BARNEY:

11 Q. You don't have any information that you  
12 can point to that would tell you that there has  
13 been no gas leaks coming from the HIP, the CIP, or  
14 the converter on any given day since December 21,  
15 2011 until the shutdown on September 27, 2013?

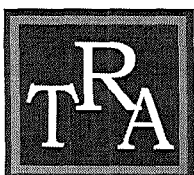
16 A. That there is no gas leaks?

17 Q. Right. You don't have any way of  
18 demonstrating that?

19 A. To say that we got the gas leaks  
20 completed, is that what you are saying?

21 MS. WEINER:

22 She's asking if there has ever been  
23 a day, as I understand it, from December 21, 2011  
24 to September 27th, 2013, when there hasn't been a  
25 gas leak.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 BY MS. BARNEY:

2 Q. That you can demonstrate?

3 A. I don't know how I would demonstrate  
4 that. I don't know exactly what I need to do to  
5 demonstrate that.

6 Q. All right. You mentioned a couple of hot  
7 shutdowns earlier.

8 A. Yes.

9 Q. Do you know what happens during a hot  
10 shutdown in terms of the gas that is in the  
11 system?

12 A. What you are saying there?

13 Q. When they take a hot shutdown in order to  
14 work on the equipment, do they have to blow the  
15 gas out?

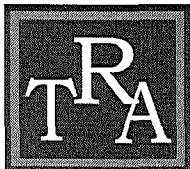
16 A. They try to minimize as much of that as  
17 they can, but they attempt to get the gas out of  
18 the system.

19 Q. And that just goes into the environment?

20 A. No. It would be captured back into a  
21 scrubbing system. They don't blow it out of the  
22 stack or anything because it can't get out there.

23 Q. So where do they blow it out?

24 A. They cool the vessel down. It is not  
25 going to go out the stack. I don't think it would



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 be visible out of the thing that I understand  
2 would be out there.

3 Q. Are you involved in any way in those hot  
4 shutdowns in terms of how they handle it  
5 environmentally?

6 A. I don't get -- no, they do not sit there  
7 and talk about that, no.

8 Q. Okay. Let me go to the November 8th  
9 interview form that I believe you produced today,  
10 Bates No. 1014. This reflects an interview  
11 between you and DEQ inspectors; is that right?

12 A. Yes.

13 Q. And how did this -- we talked about  
14 earlier about the one in September; how did this  
15 one take place?

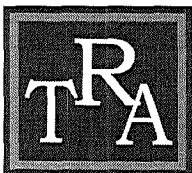
16 A. This one took place, I think, as a result  
17 of the phone call that had been made during that  
18 October 22nd.

19 Q. 27th maybe?

20 A. 27th, I think that is where this was  
21 initiated, and it trickled down to them and they  
22 finally showed up. And if you read that, that is  
23 what they state here.

24 Q. So you met with the inspectors, right?

25 A. On that day, November 8th.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Did anybody else meet with them besides  
2 you?

3 A. Dan.

4 Q. Anybody else?

5 A. No. I think that would be it.

6 Q. Who told the inspectors that in the  
7 process of starting up after the shutdown, they  
8 developed a leak by a drain valve off the HIP?

9 A. Who told them that?

10 Q. Yeah.

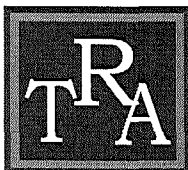
11 A. That was myself and I think Dan did the  
12 same thing because that is what I was informed,  
13 and that is when I gave them a copy of that page  
14 out of the logbook. I handed it to them.

15 Q. So the logbook says that there was a leak  
16 by the drain valve?

17 A. I don't know what the logbook says. All  
18 I know is what I handed them and I would have to  
19 go back and double-check the log.

20 Q. Who told you that there is a leak by the  
21 drain valve that developed after the startup or  
22 during the startup?

23 A. I don't think anybody particularly told  
24 me, as far as, T.J., there is a leak. I picked it  
25 up in conversations and talk about what they are



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 doing. Nobody specific told me that.

2 Q. You didn't do anything official to gather  
3 this information for the DEQ inspectors?

4 A. What I did officially, if you call it  
5 official, I handed them what I knew and I handed  
6 them the actual what was written by the operator  
7 on that -- that evening and I handed it to them.  
8 That is what I had.

9 Q. And I don't think the logbook says, but  
10 you can tell me, and I guess we'll see some day,  
11 that there was a leak by the drain valve off the  
12 HIP?

13 A. That is what my understanding was.

14 Q. But that didn't come from the logbook  
15 page, right, the operator's log in the control  
16 room?

17 A. I don't know. I would have to go read it  
18 again. I read it one time.

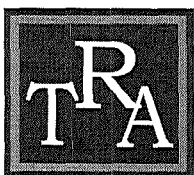
19 Q. Do you know where you got the information  
20 to tell the inspectors --

21 MS. WEINER:

22 I'm going to object. Asked and  
23 answered.

24 BY MS. BARNEY:

25 Q. -- that there was a leak that developed



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 during the startup by the drain valve off the HIP?

2 MS. WEINER:

3 Objection. That is asked and  
4 answered.

5 BY MS. BARNEY:

6 Q. You said you overheard people talking  
7 about it?

8 A. I don't know who told that to me.

9 Q. Who did you overhear talking about that?

10 A. You hear about things that maintenance  
11 needs to be done and I was told and I heard it was  
12 a drain valve.

13 MS. WEINER:

14 Do you recall specifically who that  
15 person was that --

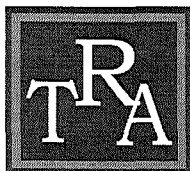
16 THE WITNESS:

17 No. I couldn't tell you who that  
18 person was.

19 BY MS. BARNEY:

20 Q. And you didn't make any effort to  
21 document that information or who you got it from  
22 when you passed it on to a public agency for them  
23 to rely on?

24 A. I handed them the document that I had in  
25 my access to that and I handed it to them. I



1 think they were told that during that  
2 conversation, that the public -- the DEQ folks.  
3 The word "drain valve" was mentioned to them.

4 Q. Let me back up. Maybe we started this  
5 wrong.

6 Did you give the inspector -- you  
7 said you met with two people, you and Dan, right?

8 A. Yes.

9 Q. Did you give the inspectors this  
10 sentence: "That in the process of starting up,  
11 they" -- meaning Dupont -- "developed a leak by  
12 drain valve off the HIP." Did you supply the  
13 inspectors with that information, or did Dan  
14 supply that?

15 A. That is what I think I told them that  
16 that is what I had heard, that it was a drain  
17 valve.

18 Q. Okay. And you felt confident enough  
19 about what you heard to relay that in an official  
20 investigation by DEQ?

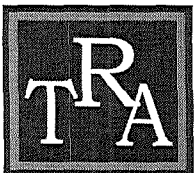
21 A. Yes.

22 Q. All right. Who told you that?

23 MS. WEINER:

24 Objection. Asked and answered.

25 Yeah. We've established that about four times.



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 BY MS. BARNEY:

2 Q. You don't know?

3 A. I would have to -- I just don't go write  
4 that down. I wasn't planning on talking to the  
5 DEQ that day, so I didn't capture it and write it  
6 down that, yeah, so-and-so told me this. There is  
7 no place that I go write those kinds of things  
8 down.

9 Q. It didn't occur to you when you are  
10 meeting with the public officials to go get  
11 somebody who had more personal knowledge about the  
12 problem?

13 A. I got Dan. And Dan took them on tour of  
14 the plant.

15 Q. So Dan knew more than you the source of  
16 the information about the drain valve?

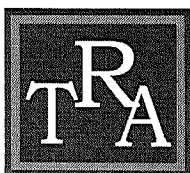
17 A. Dan knew -- Dan took them out there. He  
18 was there that day --

19 Q. That is not what I'm asking you.

20 Did Dan have a more concrete source  
21 of information for the drain valve leak that is  
22 mentioned in this report?

23 MS. WEINER:

24 And I'll object that you cut him  
25 off before he finished his answer. He was about



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 to say that Dan was out there on the 27th. He's  
2 already testified that Dan was there, he believes,  
3 when they started back up.

4 BY MS. BARNEY:

5 Q. So maybe Dan is the more concrete source;  
6 is that the answer?

7 A. He is more concrete because he was there.

8 Q. So Dan will know better than you where  
9 the information comes from to support this  
10 sentence: "In the process of starting up, a leak  
11 developed." Is that right?

12 A. I would think so. I don't make a habit,  
13 if I hear something and not telling the people  
14 what I hear. I don't start off my work with these  
15 individuals by trying to blow smoke. I tell them  
16 what I've heard and we go from there. I just -- I  
17 told them exactly what I heard. I don't try to  
18 make something up.

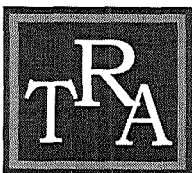
19 Q. Okay.

20 A. Okay. That is not my nature to do that.

21 Q. And so you also don't try to document the  
22 information you give to a public official?

23 A. I document it to the point that I handed  
24 them --

25 Q. The logbook. I got the logbook.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. That is what I did. And I said I think  
2 it was a drain valve. Something on that order.  
3 If I said that.

4           Q. As you sit here --

5           A. That was one of my information.

6           Q. As you sit here today, do you have any  
7 source of information that you can point to that  
8 would support the statement that, "In the process  
9 of starting up, a leak developed by the drain  
10 valve of the HIP"?

11          A. Nothing, other than what I was  
12 communicated to that day.

13          Q. On what day; November 8th or  
14 October 27th?

15          A. 27th or 28th, whenever that was.

16          Q. So -- and you don't remember who you  
17 might have heard say that?

18               MS. WEINER:

19                   Objection. Asked and answered.

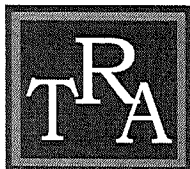
20                   You don't even have to answer.

21          BY MS. BARNEY:

22          Q. So you have no other information to  
23 support that sentence?

24          A. No.

25          Q. And you did no reporting to any



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 authorities between October 27th and November 8th  
2 when they came to you?

3 A. No, I did not.

4 Q. Did you offer to show the DEQ inspectors  
5 any recordings on Camera 13?

6 A. No, I did not.

7 Q. Did they ask if there were any cameras  
8 on-site?

9 A. No, they did not.

10 Q. How long were the DEQ inspectors at the  
11 site?

12 A. I don't know. It seems like about an  
13 hour-and-a-half. 9:20 to 10:45.

14 Q. Did you suggest or did Dan suggest that  
15 they meet with the maintenance folks who actually  
16 had personal knowledge of the crack --

17 A. I didn't suggest --

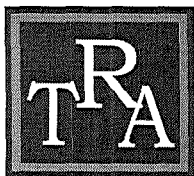
18 Q. Let me finish.

19 Who had personal knowledge of the  
20 cracks and holes in the leaking vessels that were  
21 attempting to be repaired during the turnaround?

22 A. I didn't suggest that.

23 Q. Any particular reason why?

24 A. I'm not a maintenance person and don't  
25 start telling them about maintenance issues.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Even if it's the source of the leak that  
2 the inspector is there to investigate?

3 A. I don't know if that was the source. I  
4 told them what I knew, what I heard. That's what  
5 I told them.

6 Q. And so you told them it was a new leak  
7 that started on October 27th --

8 A. I told them I heard it was a leak on the  
9 drain valve that --

10 Q. That started October 27th?

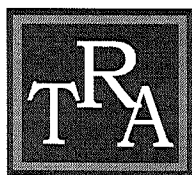
11 A. That is what I heard and that is what I  
12 told them.

13 Q. And you had not heard any information  
14 contrary to that; between October 27th and  
15 November 8th, you had not heard any competing  
16 information that maybe it was from an old hole or  
17 crack that had been there for two years?

18 A. Not really. I'm just going by what  
19 people told me. I didn't -- no, I didn't chase  
20 that down, no.

21 Q. By the time you came in on the 28th, the  
22 rates of the plant had been cut back; is that  
23 right?

24 A. Maybe. I don't know. I didn't look at  
25 the rates.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. The rates impact --

2 A. Excuse me.

3 Q. The rate of the plant, I think as you  
4 testified when we started this deposition today,  
5 would impact the significance of the leak?

6 A. It is proportional, yes.

7 Q. So as the safety guy and health guy and  
8 environmental guy, one would think that you might  
9 care how much the plant rate was cut back so that  
10 the carcinogen that is leaking out of the plant  
11 might be diminished; is that right, Mr. Ozbun?

12 MS. WEINER:

13 Objection. Argumentative.

14 Do you have a proper question to  
15 ask him?

16 MS. BARNEY:

17 I have that question.

18 THE WITNESS:

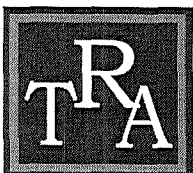
19 Say that again.

20 (Whereupon, the requested material is read  
21 back by the court reporter.)

22 THE WITNESS:

23 That did not enter my mind at that  
24 moment.

25 BY MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 Q. We have produced a video from the leak on  
2 October 27th. Do you plan to use that video in  
3 determining the extent of the leak in preparing  
4 the investigational report that is being worked on  
5 for that leak?

6 A. I haven't discussed that with anybody  
7 because I haven't seen the video. I haven't seen  
8 the video.

9 Q. All right. Have you ever met -- I may  
10 have asked you this earlier when we talked about  
11 contacts in the report.

12 Have you had any conversations with  
13 the EPA or anyone from the EPA?

14 A. No, I have not.

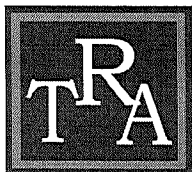
15 Q. Do you know whether anybody at DuPont has  
16 had any such conversations with the EPA?

17 A. I don't know. I don't know if they do.  
18 I do not know about it.

19 Q. Okay. Who are some of the people, if you  
20 can list them for me, that George Valentine has  
21 contacts with at the State Police?

22 A. I don't know anybody he has contacts  
23 with.

24 Q. What about dispatch for the Ascension  
25 Parish Police?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. He knows a lot of people. I don't know  
2 names of people or anything. He knows a lot of  
3 people. He was an elected official. I don't know  
4 his contacts.

5           Q. What about the sheriff's office; does he  
6 have sort of a go-to person at the sheriff's  
7 office?

8           A. I don't know.

9           Q. Is he still the point of contact person  
10 on the public information for the plant?

11          A. I don't think so.

12          Q. Who is the person, if somebody wants to  
13 contact the plant about an environmental concern,  
14 who is listed?

15          A. It would have to be Tom.

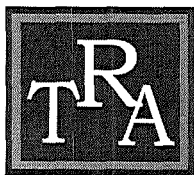
16          Q. Tom is the --

17          A. He is the plant manager, yes.

18          Q. When do you think that changed?

19          A. George has not been involved in a lot of  
20 things for a while now, since 2011 sometime. He  
21 basically does not deal with very -- he doesn't  
22 deal with anything in the control room. Has zero  
23 or very little nothing to do with the operation  
24 itself.

25          Q. So as far as you know, he wasn't involved



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 in planning the shutdown or the operations leading  
2 towards that?

3 A. No.

4 Q. What about any of the mini-shutdowns over  
5 the last year or two?

6 A. I don't think they would have talked to  
7 him. There is no reason to. He is not involved  
8 in the control room. He has not been in that  
9 position for a while now.

10 Q. So it is your testimony, he doesn't  
11 advise Elizabeth or approve what Elizabeth does?

12 A. I don't know what he and Elizabeth talk  
13 about. I don't know what their conversations are.

14 Q. Have you seen the HIP and the CIP welding  
15 scope that was prepared --

16 A. (Shakes head negatively.)

17 Q. -- after the turnaround?

18 A. No.

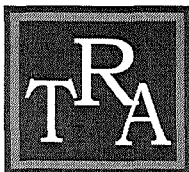
19 Q. So nobody showed you pictures of the  
20 holes and cracks that were found in the HIP or the  
21 CIP or the converter during the turnaround?

22 A. No.

23 Q. Any reason why?

24 A. Why they don't show me?

25 Q. Uh-huh.



1 A. I don't see any of the repair work. That  
2 is nothing that I see.

3 Q. Okay. Do you have any understanding as  
4 to whether the size of the hole in the vessel  
5 influences the amount of gas that the environment  
6 and people might be getting exposed to?

7 A. The size of the hole, common sense would  
8 probably say that.

9 Q. Okay.

10 A. But I don't know the relation as far as  
11 the calculations.

12 Q. As the health and safety and  
13 environmental guy, it would be relevant for your  
14 job to know what size holes and cracks they found  
15 during this turnaround, right?

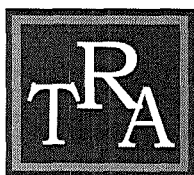
16 MS. WEINER:

17 Objection. Assumes facts not in  
18 evidence.

19 THE WITNESS:

20 I don't think it would be relevant  
21 because they can tell me and I would still not  
22 understand. They can tell me. That kind of  
23 information is never communicated to any safety  
24 person that I know of.

25 BY MS. BARNEY:



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. And why is that?

2 A. I just don't think it is. They don't  
3 tell me what they fixed when they go fix  
4 something. They don't tell me how it was fixed.  
5 They don't tell me what they did to fix it. I  
6 have a concept, but I don't go crawling up -- I  
7 don't know what kind of bead they put on it. I  
8 don't know what kind of welding rods they used. I  
9 understand when something is repaired, they go  
10 back and they start the plant back up.

11 Q. Okay. So you, as the safety and health  
12 guy, cannot report today whether or not those  
13 vessels are safe to operate -- operating in a safe  
14 fashion?

15 A. I would say they are safe to operate.

16 Q. But you have no basis for that  
17 information?

18 A. I have a basis --

19 MS. WEINER:

20 Objection.

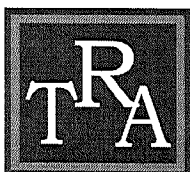
21 You can go ahead and answer.

22 THE WITNESS:

23 I have a basis on my experience.

24 BY MS. BARNEY:

25 Q. What is your basis?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. Been there a while.

2 Q. Okay. But you don't know the size of the  
3 holes and cracks that were found during the  
4 turnaround, right?

5 A. Right.

6 Q. And you don't know whether they were  
7 fixed, right?

8 A. I was told they were fixed.

9 Q. No, I think earlier you said you weren't.

10 A. Well, I understand they were fixed.

11 Q. You are assuming they were fixed because  
12 they started back up?

13 A. I have to assume that anything out there  
14 that is worked on is fixed. I can't go tell you  
15 about the inside of every vessel there.

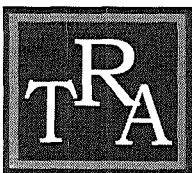
16 Q. Okay.

17 A. Reports are made and there is frequencies  
18 of those reports. I don't look at those reports.

19 Q. So you are assuming it is safe?

20 A. We are running the plant and that is my  
21 assumption. We are running the plant because we  
22 can and it is safe to run the plant.

23 Q. Do you have any plans rights now to do  
24 anything with regard to those vessels that have  
25 been leaking for a year-and-a-half in terms of



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 assessing them, making plans for them?

2 A. I don't get involved in those plans.

3 Q. Okay.

4 A. I know there were discussions about  
5 replacing them. I know that much.

6 Q. All right.

7 A. And I think they are in the process of  
8 setting some dates. That is pretty common  
9 knowledge that that will happen.

10 Q. Did they discover during the turnaround  
11 that the vessel walls are too thin to repair all  
12 of the problems?

13 A. I don't get those details.

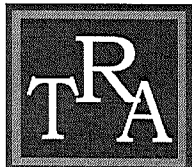
14 Q. Well, that detail would impact whether it  
15 is safe to operate, right?

16 A. I don't get those kind of details.

17 Q. The question is: That detail would bear  
18 upon whether it is safe to operate the vessel,  
19 right?

20 A. When those guys get those details and the  
21 repairs are done, everybody, I'm assuming and I  
22 would think, that they are safe to run or they  
23 would not allow it to happen.

24 Q. Okay. So who are you relying on at  
25 DuPont Burnside for that information?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1           A. They got some pretty strong people that  
2 came to the plant that maybe did some testing that  
3 we rely on all the time.

4           Q. And who are they?

5           A. We go with the guys that -- I guess the  
6 initial guys that worked on it, stating what they  
7 did.

8           Q. Who is that?

9           A. I think it might have been Volks or  
10 something like that. I don't keep up with  
11 welders. And it would be some of the Metal Urges,  
12 the guys that come off. They are not on our site.  
13 That is what they do. That is their job. Those  
14 types of people.

15          Q. Like Scott Whitlow?

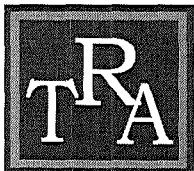
16          A. Scott.

17          Q. Anybody else?

18          A. Scott would be the one that I would have  
19 said. I don't know if anybody else would make  
20 that decision but Scott.

21          Q. Who else?

22          A. That would be the one that I was going to  
23 mention, was Scott, if things were ready and this  
24 is what needs to happen. They finish the job,  
25 they go in and look at them and say this is ready



**TORRES REPORTING & ASSOCIATES, INC.**  
COURT REPORTING & LITIGATION SERVICES  
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 to go. That is my understanding of how that  
2 works.

3 Q. Anybody else you are relying on to assume  
4 that the plant is safe to operate right now?

5 A. From just every perspective, yeah, our  
6 maintenance guys that say they fix things every  
7 day, I depend on them.

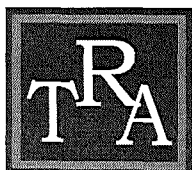
8 Q. And they are still making repairs up  
9 until yesterday?

10 A. I'm talking about everything. I'm  
11 assuming that everything, when they repair  
12 something, it is fixed. Just like I assume when  
13 the guy does my brake job on my car that, yeah, it  
14 works. That is how -- that's sort of the way I  
15 feel about what they say.

16 Q. Are you still undergoing any training in  
17 your job? I know you said you haven't done a  
18 report by yourself yet without Matt. Do you  
19 consider yourself still in the training mode or?

20 A. In portions of the job, yes.

21 Q. Okay. And right now, in terms of any  
22 reporting that would be required or notifications  
23 that would have been required with regard to the  
24 gas leaks, do you consider yourself fully trained  
25 to have made those notifications, or would you be



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

**225.751.0732**

**225.752.7308 FAX**

**New Orleans, LA**

**504.392.4791**

**504.392.4852 FAX**

**1.866.982.6878 TOLL FREE**

1 replying on somebody else to help you with that at  
2 Dupont?

3 A. I would have relied on some help.

4 Q. And who would that be?

5 A. I would talk to Matt. And we would  
6 communicate with anybody we needed to. That is  
7 not uncommon at any plant because people just  
8 don't go make -- do things on their own. It is  
9 not like cowboys out there. It is a team work.  
10 We talk about it.

11 Q. And I think you talked about earlier that  
12 Matt knows all about the hoses and the boxes?

13 A. I'm sure he does.

14 Q. And he has seen those?

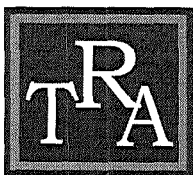
15 A. He probably has.

16 Q. And he has access to all of the incident  
17 -- initial incident reports that are put on the  
18 computer that talks about leaks?

19 A. I think he does.

20 Q. And he understood that this was an  
21 ongoing leak problem in these vessels since  
22 December 2011?

23 A. I would say he knows about it. Yeah. I  
24 would think he does. He would be the only one  
25 that did, but I would think he does.



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 Q. Did the DEQ inspector ask you to provide  
2 them with any additional information or follow-up  
3 with them?

4 A. No.

5 Q. Do you plan to send them any more  
6 information?

7 A. If they don't ask. If they were to ask  
8 me something on the report, I would give them  
9 whatever they needed. They did not ask, so I  
10 didn't see anything in writing.

11 Q. And you don't have any plans to provide  
12 the EPA or the DEQ with any information about the  
13 gas leaks that we have been talking about today?

14 A. Not to talk to the EPA, no.

15 Q. Do you have any plans to talk to the DEQ?

16 A. No, I do not, because I'm not planning on  
17 that today to do that. No, I'm not.

18 Q. Do you know why there is talk of  
19 replacing the HIP and the CIP?

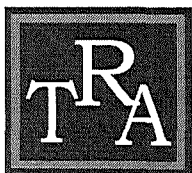
20 A. Because it needs to be.

21 Q. Why is that?

22 A. They want to get a different technology.

23 Q. Why?

24 A. Because of the -- first of all, the way  
25 they were built, there is not -- but I think there



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 is two of them and we want to go to a different  
2 technology. That is what I hear. I don't get  
3 involved in those discussions.

4 Q. Is there a problem with the IPET (ph)?

5 A. A problem? I don't know what the problem  
6 would be.

7 Q. So as far as you know, the current plan  
8 is to just keep operating until they can replace  
9 the HIP and the CIP?

10 A. As far as I know.

11 MS. BARNEY:

12 I think that is all I have.

13 MS. WEINER:

14 I have a few follow-up questions.

15 Do you need to take a break or  
16 anything?

17 THE WITNESS:

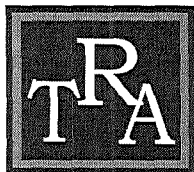
18 No.

19 EXAMINATION BY MS. WEINER:

20 Q. The MSDS sheet that Ms. Barney asked you  
21 some questions about, SQT, is this for liquid  
22 sulfur trioxide?

23 A. Yes.

24 Q. Is that the same material, as far as you  
25 know, that is the subject of the leaks from the



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 HIP and the CIP?

2 A. No. They are vapors. That is what I  
3 call them, vapors.

4 Q. So all of the discussion and the  
5 questions that Ms. Barney asked you about the  
6 effects, PPE, all of the things that she went  
7 through with you, in your view, would those apply  
8 to the HIP and the CIP leaks out of the Burnside  
9 plant?

10 A. As far as vapor release, yes, some of  
11 them would.

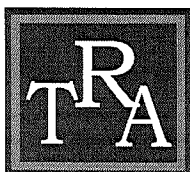
12 Q. Are the health effects that are discussed  
13 in this MSDS for liquid sulfur trioxide going to  
14 be the same as a vapor or mist at the plant?

15 A. The liquid portion, I would be concerned  
16 about skin contact, those things. That is when we  
17 talk about skin contact and the vapors would be  
18 the inhalation portion. That is why it is called  
19 inhalation hazard.

20 Q. The intensity of exposure is going to be  
21 different from a liquid and mist exposure; is that  
22 true?

23 A. There are going to be some burns, yes.

24 Q. There are going to be some burns if it is  
25 liquid?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 A. If it is liquid.

2 Q. The severity is not the same?

3 MS. BARNEY:

4 Objection. Lack of foundation.

5 BY MS. WEINER:

6 Q. If it is a mist, the severity of the  
7 exposure is not going to be same for a liquid as  
8 it is a mist?

9 MS. BARNEY:

10 Objection. Lack of foundation and  
11 leading.

12 THE WITNESS:

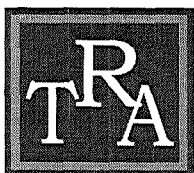
13 Not in my experience, it would not  
14 be.

15 BY MS. WEINER:

16 Q. Is your understanding, just from what you  
17 heard, because I know you don't have personal  
18 information on Leo Scott, was Leo Scott, as far as  
19 you understand, exposed or says he was exposed to  
20 a mist or liquid?

21 A. From what I seen was my only personal.  
22 He was wearing a respirator. That tells me it  
23 must have been -- the respirator won't take care  
24 of a liquid.

25 Q. So Leo walking around was trying to



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 protect himself from a mist exposure in your view?

2 A. That is what I'm thinking. That is the  
3 one thing I can say it was.

4 MS. WEINER:

5 That is all I have.

6 Thank you.

7 RE-EXAMINATION BY MS. BARNEY:

8 Q. Mr. Ozbun, he could also be protecting  
9 himself from a vapor exposure, right?

10 A. Vapor, yes. That is the terminology I  
11 use.

12 Q. And the only way to be exposed to a  
13 liquid SO3 would be to have the liquid at what  
14 temperature?

15 A. You are getting pretty detailed on me. I  
16 don't have those temps.

17 Q. At an ambient room temperature?

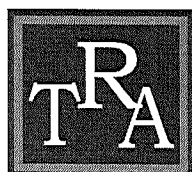
18 A. It would probably --

19 Q. It would not be a liquid, right?

20 A. If it was released in this room right  
21 now, it would be a liquid for a portion of the  
22 time.

23 Q. And --

24 A. It just doesn't splash out and turn into  
25 a vapor. There would be a certain amount that



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**

225.751.0732

225.752.7308 FAX

**New Orleans, LA**

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 would be a liquid.

2 Q. So when the vapor leaves the vessels that  
3 it is leaking from, it is SO3 as it is leaving the  
4 vessels; it is a vapor that is leaving the  
5 vessels, right?

6 A. From what I understand, it is mixing at  
7 that point. There is some mixing that is taking  
8 place and that is where those calculations come in  
9 that the engineer types and can give you those  
10 specific numbers on what those calculations are.

11 Q. You mean the calculations --

12 A. As far as what the volume is or the  
13 percentage is.

14 Q. I wasn't asking you about quantity. I  
15 was saying that there is a vapor coming out of  
16 these vessels, an SO3 vapor, right? That is what  
17 you said.

18 A. That is mixing in with the atmosphere.

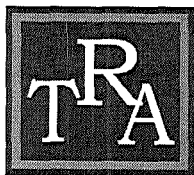
19 Q. Right. Once it gets out, right, and  
20 mixes with the moisture in the air?

21 A. Yes.

22 Q. But what is coming out of the vessels can  
23 be SO3 --

24 A. SO2 and SO3.

25 Q. -- vapor?



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



1 A. SO2 or 3.

2 Q. I'm asking, is that vapor or liquid?

3 A. Could be a vapor.

4 Q. And you don't have any sort of medical  
5 training or any background at all that would allow  
6 you to sit here and tell me what an MSDS for SO3  
7 vapor says as compared to a MSDS for SO3 liquid,  
8 right?

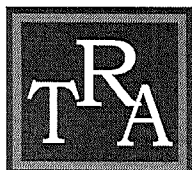
9 A. I don't think it would require medical  
10 training. I just know what they state.

11 Q. You said something about your experience.  
12 What experience do you have with a person being  
13 exposed to an SO3 liquid?

14 A. Very little because I don't think it has  
15 happened before. All I can go by is what I was  
16 told and the experience and why we wear PPE. It  
17 is an acid and it is a corrosive and it will burn  
18 the skin. And that is what it does. That is why  
19 it is called a corrosive.

20 Q. All right. And so it is your  
21 understanding, I guess, based on your responses to  
22 Ms. Weiner, that there is a different MSDS at  
23 Dupont for SO3 vapor versus an SO3 liquid?

24 A. The sulfur trioxide, there is a -- they  
25 talk about the liquid in it and they talk about



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX  
**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 the vapor.

2 Q. In the same MSDS?

3 A. Yes.

4 Q. Does this one do that, as well?

5 A. I don't know. I haven't look at that.

6 Q. Let's look back at the exhibit to the  
7 deposition.

8 A. This is --

9 MS. BARNEY:

10 I don't think that is the one.

11 MS. WEINER:

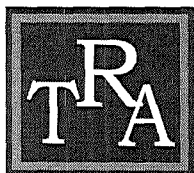
12 It is the exact one, but that is in  
13 color.

14 BY MS. BARNEY:

15 Q. So there is a vapor part of this and a  
16 liquid; is that your testimony?

17 A. There is, right here, they are talking  
18 about skin contact because it is a corrosive, eye  
19 contact, and then we talk about inhalation. That  
20 would be the vapor piece of it.

21 Q. Okay. So the hazards and the -- all the  
22 things we talked about earlier, the hazards that  
23 we described, are on the same MSDS which pertain  
24 to both an SO3 vapor and SO3 liquid; is that  
25 right?



1           A. The vapor portion, yes. Because that is  
2 why they would wear the respirator. That is why  
3 we deem that so with the PPE that we tell people  
4 to wear.

5           Q. So vapor can irritate your eyes, right?  
6 You don't have to stick your head in a bucket of  
7 liquid SO3?

8           A. It is an irritation.

9           Q. And vapor -- SO3 vapor can irritate your  
10 throat, right?

11          A. Yes, it can.

12          Q. I think earlier you were talking about  
13 liquid or -- oleum being spilled during a training  
14 session, 65 percent oleum?

15          A. When we talked about out in the desert,  
16 yes.

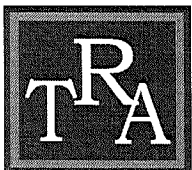
17          Q. And so basically liquid SO3 on the ground  
18 is oleum and it is the vapor -- the SO3 vapor that  
19 comes off of that; is that right?

20          A. It is not oleum.

21          Q. 65 percent oleum?

22          A. 65 percent, it is a totally different  
23 product than sulfur trioxide.

24          Q. Okay. Is there any part of this MSDS  
25 that you think does not apply to an SO3 vapor



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 exposure?

2 A. You say does not apply to a vapor?

3 Q. Right.

4 A. Because it states here it is -- they  
5 actually state the inhalation problems.

6 Q. Have you read any legal cases regarding  
7 TSCA?

8 A. Read any legal cases, no, I have not.

9 Q. Have you in the exhibit that we referred  
10 to earlier, Exhibit 11, it refers to a Federal  
11 Register No. 68. Have you read Federal Register  
12 No. 68?

13 A. No, I have not.

14 Q. That is not part of your job at --

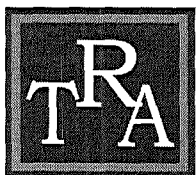
15 A. To read Federal Register 68, no. Not  
16 that I know of.

17 Q. Have you had any conversations with Matt  
18 Barnes about Federal Register No. 68?

19 A. No.

20 Q. Okay. Have you had any conversations  
21 with him about TSCA?

22 A. No. Other than the fact that this was a  
23 TSCA lawsuit. We did -- we do know that, but it  
24 was no -- that is just what it was about and I  
25 think he had seen maybe the same document I had



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

1 seen.

2 Q. Okay. Do you know whether or not anybody  
3 at the corporate level at Dupont has made any kind  
4 of reports or notifications under TSCA?

5 A. I don't know that. I do not know what  
6 anybody else does.

7 Q. Even if it pertains to the Burnside  
8 plant?

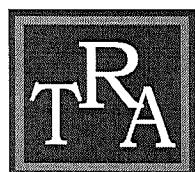
9 A. I don't know that.

10 MS. BARNEY:

11 That, I think is all I have.

12  
13 (DEPOSITION CONCLUDED AT 5:10 P.M.)

14 \* \* \* \* \*



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732  
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

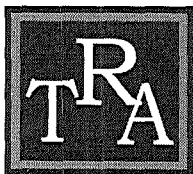
## 1 REPORTER'S CERTIFICATE

2  
3 I, SELINA P. ROUSSEL, Certified  
4 Court Reporter in and for The State of Louisiana,  
5 as the officer before whom this testimony was  
6 taken, do hereby certify that T.J. OZBUN, after  
7 having been first duly sworn by me upon authority  
8 of R.S. 37:2554, did testify as hereinbefore set  
9 forth in the foregoing 304 pages;

10 That the testimony was reported by  
11 me in stenotype reporting method, was prepared and  
12 transcribed by me or under my personal direction  
13 and supervision, and is a true and correct  
14 transcript, to the best of my ability and  
15 understanding;

16 That the transcript has been  
17 prepared in compliance with transcript format  
18 guidelines required by statute or by rules of the  
19 board, that I have acted in compliance with the  
20 prohibition on contractual relationships, as  
21 defined by Louisiana Code of Civil Procedure  
22 Article 1434 and in rules and advisory opinions of  
23 the board;

24 That I am not related to counsel or  
25 to the parties herein, nor am I otherwise

**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING &amp; LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

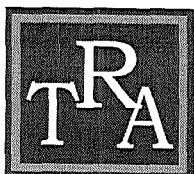
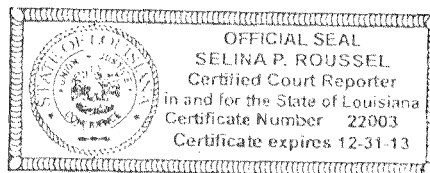
1 interested in the outcome of this matter.  
2

3 DATED THIS 16TH DAY OF DECEMBER, 2013  
4

5 *Selina P. Roussel*  
6

7  
8 SELINA P. ROUSSEL, CCR, RPR

9 CERTIFIED COURT REPORTER  
10



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

**Baton Rouge, LA**  
225.751.0732

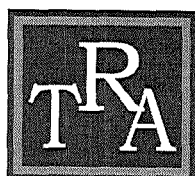
225.752.7308 FAX

**New Orleans, LA**  
504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>A</b>	18:11	25:24	149:19 223:13	25:18
<b>AAIs</b> 145:18	<b>acid</b> 42:22 81:22	<b>advise</b> 287:11	223:23,23	<b>annual</b> 242:23
<b>ability</b> 306:14	82:2,9 141:20	<b>advised</b> 158:4	289:21	<b>annually</b> 67:4
<b>able</b> 17:4 29:9	156:13 178:1,1	225:23	<b>Aid</b> 182:10	<b>answer</b> 4:14
33:15 36:2	179:13 301:17	<b>advisory</b> 306:22	<b>air</b> 49:14 63:5	7:23 8:12
39:24 41:3	<b>acids</b> 42:25	<b>affirmation</b>	65:18 108:17	14:11 26:22
50:8 52:9,11	<b>acid/oleum</b>	246:13	153:13,21	73:16 82:5,6
53:11 54:12,17	141:17	<b>afford</b> 41:15	154:19 300:20	110:19 111:12
72:13 87:9	<b>acronym</b> 43:21	<b>aforementioned</b>	<b>Airline</b> 5:11	113:2 122:8
160:9 197:8	43:23	4:5	<b>AL</b> 1:4	149:19 216:7
<b>above-mentio...</b>	<b>Act</b> 142:11	<b>afraid</b> 179:24	<b>alarms</b> 170:25	234:1 235:8
5:3	173:2	<b>agencies</b> 46:16	<b>Albarez</b> 118:6,7	243:15 279:25
<b>Absolutely</b>	<b>acted</b> 80:18	49:2 55:9	<b>alkalis</b> 151:12	280:6 281:20
234:20	306:19	89:14,17 90:22	<b>alleged</b> 69:17	289:21
<b>absorbed</b> 154:22	<b>activities</b> 60:3	108:8 204:18	<b>Allen</b> 183:21,22	<b>answered</b> 30:17
<b>Absorbing</b>	213:8	205:9,12	184:17,18	43:14 110:16
36:19	<b>activity</b> 120:20	<b>agency</b> 24:2,4	<b>alleviate</b> 269:24	110:24 113:1
<b>absorbs</b> 154:19	<b>actual</b> 51:25	26:1 88:7 91:9	<b>alleviated</b> 29:16	113:14 115:18
<b>absorption</b>	61:7 67:22	91:15 92:1	<b>Allopurinol</b> 8:21	139:2,5 216:3
179:21	96:2 101:25	164:24 165:4	<b>allow</b> 46:16	272:7 276:23
<b>accepted</b> 159:3	106:15 118:14	165:12 176:8	216:10 291:23	277:4 278:24
<b>access</b> 38:21	147:19 240:10	200:6 202:1	301:5	281:19
52:19,20,23	249:13 276:6	277:22	<b>ambient</b> 299:17	<b>answers</b> 8:4,16
53:10,18 63:22	<b>additional</b>	<b>agents</b> 151:11	<b>AMERICA</b> 1:4	243:14
89:11,18,20	267:10 295:2	<b>aggravation</b>	<b>amount</b> 17:13	<b>anticipate</b> 124:7
117:25 142:17	<b>address</b> 5:9,13	209:3	31:16 55:12	127:9
142:18 197:6	214:11 215:13	<b>ago</b> 7:2,2 31:2	85:8,11,12,13	<b>anticipated</b>
197:15,20,25	251:1	76:12 92:21	87:1 131:22	232:11
198:1 202:25	<b>addressing</b>	100:6 168:8	147:9 159:19	<b>anybody</b> 9:8
203:7 220:7,8	216:9	179:15,16	160:11 169:15	31:25 57:21
220:11 222:19	<b>adjust</b> 217:11	206:1,3 207:21	172:11 288:5	58:8 81:1
231:15 232:25	269:19	211:21 219:16	299:25	82:15 94:9
233:2 260:6	<b>administering</b>	235:3	<b>amounts</b> 190:17	95:15 97:1
277:25 294:16	4:20	<b>agree</b> 141:23	<b>analysis</b> 148:22	103:15 113:19
<b>accessible</b> 17:19	<b>administrator</b>	144:8 145:4	<b>analytical</b> 51:4	114:2 120:13
67:10	164:23 165:3	153:12,20	<b>animals</b> 146:21	120:21 129:1
<b>accident</b> 12:9	165:11,22	154:2,18 155:1	<b>Ann</b> 44:22 46:19	132:14 135:20
<b>accurate</b> 8:16	167:21	<b>agreed</b> 4:3	46:25 47:19,23	137:14,15
210:10	<b>admit</b> 144:4	<b>ahead</b> 8:11 15:6	48:1 50:5	140:2 141:1
<b>accuse</b> 258:18	<b>Adrian</b> 31:5	72:18 79:9	128:20 206:7	158:4 165:21
<b>accustomed</b>	<b>advertising</b>	94:21 113:2,15	<b>anniversary</b>	168:25 169:6



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

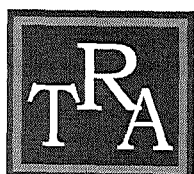
Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



170:4 175:24 196:21,22 197:10 203:14 203:24 204:10 205:7 216:10 219:5,19,24 227:10 228:1,6 237:24 240:22 244:24 249:10 263:10 265:13 275:1,4,23 285:6,15,22 292:17,19 293:3 294:6 305:2,6 <b>anybody's</b> 245:16 <b>anymore</b> 41:3 41:12 156:2 159:2 162:5 <b>anytime</b> 6:3 140:14,14 <b>apparatus</b> 167:11 171:1 <b>apparently</b> 213:6 238:13 249:21 <b>appear</b> 110:25 <b>APPEARANC...</b> 2:1 <b>applicable</b> 233:22 259:5 271:12 <b>application</b> 26:2 <b>applications</b> 25:4 59:22 <b>apply</b> 297:7 303:25 304:2 <b>applying</b> 60:13 <b>appreciation</b> 175:13	<b>approve</b> 287:11 <b>approved</b> 166:21,24 167:2 <b>approved/cert...</b> 151:20,25 152:15 <b>April</b> 24:25 25:17 101:14 103:20 130:2 131:6,8 222:11 <b>archive</b> 50:17 249:23 <b>area</b> 45:25 53:13 54:15 66:2 98:20 106:5 108:25 157:23 160:12,13,14 160:16 164:13 170:18 171:23 174:19 182:3 182:10 215:8 215:10,18 216:11,22 <b>areas</b> 53:1 65:23 66:6 <b>Argumentative</b> 284:13 <b>arranging</b> 168:10 <b>array</b> 52:5 <b>arrived</b> 81:8 <b>Article</b> 306:22 <b>asbestos</b> 7:8 <b>Ascension</b> 182:21 183:15 285:24 <b>Asian</b> 80:11 <b>aside</b> 71:12 73:21 225:17 <b>asked</b> 7:14 25:7	25:9,10 68:5 81:9 100:8,20 100:21 105:22 107:15,23 108:5 110:16 110:24 112:3,7 113:1,14 115:17,19,22 116:9 158:5 173:15,25 174:2,5 177:21 211:7 229:14 233:9,13 240:17 243:21 252:8,12,18 255:6 261:10 262:23 264:12 265:10 272:7 276:22 277:3 278:24 281:19 285:10 296:20 297:5 <b>asking</b> 58:19 82:22,24 121:11 146:7 167:20 272:22 279:19 300:14 301:2 <b>asks</b> 116:12 <b>aspect</b> 61:18 <b>assess</b> 221:22 227:11 <b>assessed</b> 174:17 <b>assessing</b> 228:2 291:1 <b>assessment</b> 175:2 213:7 <b>assigned</b> 61:8 170:3,4,8 242:5 <b>assignment</b>	206:8 <b>assume</b> 46:25 260:5 290:13 293:3,12 <b>assumed</b> 250:19 <b>assumes</b> 110:3 288:17 <b>assuming</b> 40:14 141:4 147:13 193:1 194:1 204:8 248:24 290:11,19 291:21 293:11 <b>assumption</b> 290:21 <b>atmosphere</b> 159:16 300:18 <b>attach</b> 247:6 <b>attached</b> 70:12 173:18 189:10 190:25 196:14 202:6 220:9,23 222:18 232:3 251:18,25 252:5 266:13 266:17 <b>attaches</b> 213:3 <b>attaching</b> 213:2 <b>attachment</b> 189:20 198:15 213:11 <b>attempt</b> 273:17 <b>attempting</b> 282:21 <b>attend</b> 225:9 <b>attended</b> 104:4 <b>attention</b> 128:11 <b>audio</b> 15:6 <b>audit</b> 101:7,10 101:18,21,25 102:20,21	103:1,2,10,16 105:14,15 106:3,19,20 107:6,19 108:15,16,20 109:18 111:5,8 111:23 112:14 207:3 <b>audited</b> 111:14 <b>auditing</b> 42:5 <b>auditors</b> 109:2 109:12,22 112:23 114:4 118:19 <b>audits</b> 42:6 <b>August</b> 48:14,14 48:16 49:17 50:9 55:14 56:15 <b>authorities</b> 38:16 204:24 282:1 <b>authority</b> 90:14 306:7 <b>automated</b> 29:7 <b>automatic</b> 52:5 <b>automatically</b> 231:14 <b>available</b> 146:15 157:22 192:24 210:1 237:24 238:1 <b>aware</b> 9:10 59:8 64:5 70:18 72:10 77:7,9 77:10,15,16,18 88:6 89:6,8 90:8 91:5,25 92:19 93:23 95:2 96:6,25 99:13,18,19,20
---	---	--	--	---



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

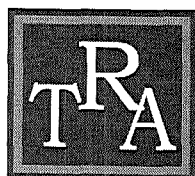
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

100:1,7,13	93:16 96:11	<b>Barney</b> 2:4,4,17	247:8,17,22	253:21 274:10
113:21 118:25	104:3 107:12	2:22 5:5 14:8	248:2 249:3	<b>bathroom</b>
123:21 127:25	111:19 114:24	14:19 15:3,10	253:20 255:21	135:18
158:10 164:16	127:1 128:2,15	15:15,22,24	255:25 263:25	<b>Baton</b> 2:5 16:20
165:7,17 168:2	130:19 131:12	16:8 17:6,8	264:9,19,25	19:24 23:5,9
169:3 171:3,7	131:23 132:10	18:24 19:11,15	265:9 272:3,10	23:10,23 24:10
172:10 179:11	141:9 148:25	19:19 65:10	273:1 276:24	206:21
194:14 204:16	161:13 173:23	72:21 73:7	277:5,19 279:1	<b>battery-operat...</b>
204:19 205:2	181:4 196:16	79:8,17,21	280:4 281:21	158:25
244:20,21	198:2 211:10	80:15 84:6	284:16,25	<b>bead</b> 289:7
252:20,24	212:3,5 220:23	89:9 91:19,24	288:25 289:24	<b>bear</b> 121:11
253:9 254:1	223:1,3,13,23	99:17 106:2	296:11,20	291:17
268:14	231:25 232:2,9	107:25 108:14	297:5 298:3,9	<b>bearing</b> 148:9
<b>awareness</b> 77:12	232:10,16	109:10 110:7	299:7 302:9,14	<b>beats</b> 152:3
242:19 268:2	236:16 239:10	110:18 111:3	305:10	<b>Beau</b> 28:2
<b>A.M</b> 1:22	247:9 248:9	112:10 113:8	<b>based</b> 66:25	<b>becoming</b> 29:7
<b>B</b>	251:25 253:4	113:22 125:12	160:1 301:21	<b>BEHALF</b> 1:12
<b>B</b> 116:21 241:25	254:1 258:3,10	125:18 126:10	<b>basically</b> 17:9	<b>behave</b> 226:15
<b>Bachelor</b> 21:13	261:24 263:4	126:16 127:2	21:13 29:10	<b>behavior</b> 139:8
21:18	263:18,22	127:18,24	35:17 40:23	<b>belief</b> 139:18
<b>back</b> 7:2 13:3	266:11 267:9	133:1,6,11,13	41:2 57:16	<b>believe</b> 14:11
19:2,20,25	269:8,9,16	134:19 135:5,8	60:10 65:20	69:24 112:13
20:5 22:15	273:20 275:19	136:16 142:22	66:15 114:20	120:5 138:22
23:4 26:1,17	278:4 280:3	143:17,20,23	138:4 159:24	139:16 144:24
27:6 29:6	283:22 284:9	144:3,16,18	170:7 241:3	150:5 154:25
30:20 31:24	284:21 289:10	145:19 146:2	259:23 286:21	175:19 176:13
32:16,23 33:6	289:10 290:12	146:10,19	303:17	188:6,9,24
33:14,18,19	302:6	149:22 150:4	<b>basin</b> 156:25	202:22 210:20
34:16,25 35:7	<b>background</b>	154:11,15	<b>basis</b> 8:19 73:8	210:23 242:25
36:7,14,17	19:23 63:8	181:16 187:3,8	289:16,18,23	250:2 257:1
37:1,10,16	301:5	187:10,19	289:25	258:7 274:9
38:5,13,14	<b>bad</b> 7:21 30:18	188:11,18	<b>Bates</b> 14:17	<b>believed</b> 258:4
39:20 41:8,21	<b>Bailey</b> 23:12,14	189:21 193:4	79:14 85:20	<b>believes</b> 280:2
44:24 53:4	209:8,11	193:10,13	186:25 188:25	<b>bell</b> 27:19 69:25
59:2,5,13,14	<b>barges</b> 30:1	196:7 198:24	192:5,15	245:5
60:19 64:6	<b>Barnes</b> 48:19	205:17 210:19	195:22 205:19	<b>bells</b> 171:9
67:5 72:8	51:9,11 60:25	220:1,25 221:4	210:22 220:19	<b>benefits</b> 6:15
73:11 76:24	77:5 78:4	231:4 234:24	235:1,10 236:7	<b>Benjamin</b>
77:1,13,19	81:24 92:8	235:2,23	237:2,17 239:9	264:13,16
83:19,20,21	195:4,9 226:24	238:12,19,21	239:19 246:5	<b>Bergeron</b> 27:18
84:7 92:4	304:18	241:22 246:2	248:18,23	<b>best</b> 8:10 269:10



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

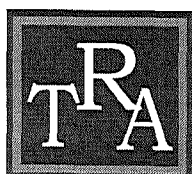
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

306:14	249:23	85:12,13 102:7	205:24 228:23	41:6 42:17
<b>better</b> 44:1 60:8	<b>booth</b> 180:3	103:2 119:14	232:22 236:14	43:16,20 63:6
163:18 245:22	<b>boots</b> 151:21	223:7 224:6	245:16 265:23	64:20 66:11,12
280:8	152:1,20,23	<b>Brownwood</b>	267:25 268:10	67:9 76:3 79:1
<b>beyond</b> 38:8,10	153:9 214:7	20:21	268:22 271:25	92:21,24 93:5
53:25 115:9	<b>Borderland</b>	<b>buck</b> 86:14	291:25 297:8	93:7 97:6
<b>big</b> 63:7 160:20	103:8	<b>bucket</b> 303:6	305:7	101:7 104:2
163:12,19	<b>boss</b> 12:15 49:24	<b>build</b> 166:23	<b>bush</b> 152:3	105:7 114:18
178:23,23	56:10 81:5	<b>building</b> 177:13	<b>business</b> 17:4	114:19 116:11
227:15 238:25	<b>bottom</b> 79:23	<b>built</b> 164:10	24:9,11,23	129:5,22 132:2
<b>binder</b> 64:10	86:5 236:20	295:25	43:8 123:12	152:6,7,8
<b>binders</b> 19:16	239:22 253:22	<b>bulletin</b> 130:9	263:5	153:6 159:18
<b>biomonitoring</b>	<b>Boudreaux</b> 10:3	131:1,3	<b>button</b> 33:21,23	162:10 165:19
49:12	11:14,18	<b>bunch</b> 188:4	33:25 34:3,9	174:20 180:18
<b>bit</b> 168:13	<b>bought</b> 169:5	<b>Burkel</b> 40:21	<b>buttons</b> 234:2	184:10,11,12
<b>black</b> 171:3	<b>Boulevard</b> 24:15	<b>burn</b> 128:24	<b>buy</b> 169:9	185:2,4,6,12
202:11,17	24:16	149:2,3 301:17	<b>B.S</b> 21:9	185:14 190:11
266:13,17	<b>Bourque</b> 28:2	<b>burned</b> 149:4		190:13 204:23
<b>Blanchard</b>	<b>box</b> 167:10	<b>burners</b> 34:20	<b>C</b>	205:5,5 209:8
69:25 72:11,22	<b>boxes</b> 114:13	<b>burning</b> 34:19	<b>C</b> 116:21	209:10,11
217:21	251:17 294:12	34:20	<b>cabinet</b> 212:19	241:1,4,6,10
<b>Blanchard's</b>	<b>brain</b> 127:9	<b>burns</b> 10:1,11	<b>calculate</b> 6:18	252:25 254:22
72:17	<b>brake</b> 293:13	10:15 148:5	235:7 247:3	255:2,18
<b>blew</b> 100:18,19	<b>break</b> 8:8,10,12	297:23,24	<b>calculated</b>	256:14,21
101:2	65:8 78:12	<b>Burnside</b> 5:22	233:24 240:10	257:3 260:10
<b>block</b> 233:17	125:19 126:12	18:15 44:17	<b>calculations</b>	261:7 263:21
234:10 235:5	154:4 158:18	64:5 69:9,22	88:25 89:5	270:25 271:14
<b>blocks</b> 240:10,12	188:12 234:18	70:6 76:1 77:3	190:12,13,15	271:15 274:17
<b>blow</b> 171:12	296:15	78:5 81:19	190:24 192:10	276:4 297:3
273:14,21,23	<b>breakfast</b> 11:7	99:14 100:14	192:12,18	<b>called</b> 18:5
280:15	<b>breaks</b> 106:17	103:16 106:5	194:3,10,19	22:17 26:3
<b>blurb</b> 259:9	<b>breath</b> 155:14	106:22 108:22	195:6,7,10,12	27:7 31:19
<b>board</b> 130:9	<b>brief</b> 65:9	111:8 117:20	195:15 198:7	39:21 41:25
131:2,3 306:19	234:21	118:17 120:22	199:18 200:8	43:18 44:22,23
306:23	<b>briefly</b> 78:14	121:13 129:1	203:16 240:13	53:10 68:14
<b>body</b> 153:10	<b>bring</b> 16:19	159:25 162:17	288:11 300:8	76:1 91:10,12
<b>bolts</b> 46:6	156:23	163:9 164:6,18	300:10,11	102:7,8,16
<b>bombarded</b>	<b>bringing</b> 129:13	166:11,22	<b>calibration</b>	104:15 119:21
150:25	<b>broken</b> 123:10	167:3 168:17	158:16	129:11,16
<b>bombs</b> 157:10	<b>bronchi</b> 155:18	169:14 174:5	<b>call</b> 18:8 37:2,11	142:1 143:12
<b>book</b> 106:16	<b>brought</b> 46:15	200:2 203:14	37:12 38:15,18	155:4,25
			38:20,20,25	



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

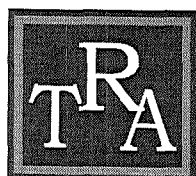
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

175:21 179:8 180:5,15 182:18 183:3,7 183:8,10,20,22 184:16,16,17 184:19 191:11 205:12 226:24 227:1 235:5,12 242:14 244:1 245:21,22 255:5 260:13 260:25 261:1,3 261:7,19,20,24 267:15,18 271:9 297:18 301:19 <b>calling</b> 60:9 129:15 204:17 205:8 <b>calls</b> 78:8 81:12 109:9 144:14 184:4,5,6,7 252:25 <b>camera</b> 52:14 126:20 230:22 257:20,22 260:6,16 282:5 <b>cameras</b> 44:13 258:1 282:7 <b>cancer</b> 141:24 <b>cancer-causing</b> 142:5 <b>cane</b> 164:16 <b>capable</b> 203:15 <b>capture</b> 54:17 171:5 193:6 279:5 <b>captured</b> 95:18 163:11 273:20 <b>car</b> 214:2 293:13 <b>carbon</b> 169:20	212:8 <b>carcinogen</b> 284:10 <b>carcinogenic</b> 151:5 <b>card</b> 43:21 44:1 179:6 <b>care</b> 60:10 122:4 123:10 160:8,9 225:11 228:17 284:9 298:23 <b>career</b> 207:7 <b>carries</b> 228:24 <b>carry</b> 228:14 <b>cars</b> 179:12 <b>case</b> 10:20,21 19:3,12 68:5,8 68:11 69:14,21 90:4 138:5,9 144:2,5,25 255:16 264:4 270:4 <b>cases</b> 304:6,8 <b>caseworker</b> 22:23 <b>catch</b> 51:23 <b>catchall</b> 42:15 <b>categorize</b> 249:18 <b>category</b> 111:24 117:17 <b>Cathy</b> 30:9,12 30:13 59:11 <b>caught</b> 262:21 <b>cause</b> 1:13 141:24 145:21 147:10 155:5 155:12 <b>caused</b> 47:11 <b>Cayette</b> 69:25 <b>cced</b> 211:3,7	<b>CCR</b> 307:8 <b>cell</b> 38:21,23,24 86:16 <b>Center</b> 20:8,9 <b>certain</b> 31:16 50:12 131:22 145:22 147:6,8 147:11,16,17 157:12,23 158:21 175:15 180:6 213:12 213:16 238:2 299:25 <b>certificate</b> 2:24 21:17 306:1 <b>certification</b> 4:11 <b>certifications</b> 57:11 <b>Certified</b> 1:14 4:18 5:3 306:3 307:9 <b>certify</b> 306:6 <b>chair</b> 229:24 <b>challenges</b> 44:15 <b>chance</b> 265:5 <b>chances</b> 215:8 <b>change</b> 29:2,11 29:13 39:4 40:18 44:6 56:12 57:22 105:7 <b>changed</b> 19:3 29:4 31:8 39:6 57:22 143:13 286:18 <b>changes</b> 57:17 59:23 60:13 67:8,9 196:25 <b>changing</b> 39:19 41:17 52:4	<b>charge</b> 17:17 44:17 179:22 196:17,19 227:14 <b>Charles</b> 180:15 <b>chase</b> 140:17 283:19 <b>chased</b> 88:21 <b>chasing</b> 232:13 243:24 255:20 <b>check</b> 19:6 115:7 115:9 126:15 <b>checked</b> 256:9 <b>checks</b> 114:19 134:21 <b>chemical</b> 155:19 175:16 176:6 199:19 203:19 204:8 <b>chemicals</b> 142:12 168:7 <b>chicken</b> 22:17 <b>chickens</b> 22:18 <b>child</b> 20:5 <b>chlorosulfonic</b> 156:13 <b>choice</b> 40:13 <b>chose</b> 41:19 <b>Christmas</b> 71:10 <b>chronological</b> 236:4 <b>CIP</b> 70:11,16 75:4 84:11 88:8 89:25 90:16 92:15 105:24 106:13 107:7,17,18 108:10,23 109:16 110:13 111:25 112:16 112:24 113:10	113:24 118:21 119:1 122:5,13 123:13,25 124:10 164:25 165:5,13,23 166:7 167:6 171:15 173:16 174:7 178:16 179:18 189:13 189:19 190:8 190:22 191:6,9 191:14,18,23 192:2 195:11 195:15 196:1 198:10 199:24 200:4 201:1 202:3,19 215:18 216:16 222:16 225:24 249:8 251:18 266:14,17 269:6 270:22 270:24 271:7 272:13 287:14 287:21 295:19 296:9 297:1,8 <b>CITIPLACE</b> 2:5 <b>Civil</b> 4:6 306:21 <b>claim</b> 263:2 <b>claimed</b> 136:19 137:4 141:3 <b>claiming</b> 137:11 <b>clarify</b> 14:11 70:10 91:23 126:1 208:16 <b>clarifying</b> 96:19 <b>Class</b> 142:4 <b>classes</b> 217:24 <b>Classification</b> 248:5
---	--	--	---	--



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

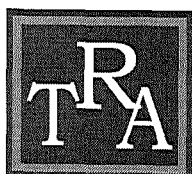
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>clean-up</b> 127:22	<b>coffee</b> 11:7	104:7 162:25	<b>compared</b>	280:5,7
<b>clear</b> 146:7	<b>cognitive</b> 123:5	178:24 185:7	147:18 301:7	<b>condensation</b>
165:20 226:2	<b>cold</b> 123:18,21	185:16 206:21	<b>competing</b>	153:25
<b>Clemente</b>	123:21,23	269:5 272:13	283:15	<b>conditions</b>
180:14	124:1,9,15,20	300:15,22	<b>compiles</b> 119:20	153:12,20
<b>Clemons</b> 237:5,6	222:5,8 251:7	<b>COMMENCI...</b>	<b>complaining</b>	<b>conducting</b>
<b>clerks</b> 225:10	<b>collected</b> 199:2	1:22	261:9	107:6
<b>Cleve</b> 182:16	<b>college</b> 22:4	<b>commenting</b>	<b>complaint</b> 69:17	<b>confer</b> 108:6
<b>Cleveland</b> 28:1	<b>color</b> 302:13	218:24	69:18 129:9,14	265:2,4
<b>click</b> 117:25	<b>Colorado</b> 178:10	<b>committee</b>	142:24 183:16	<b>confidence</b>
191:2 232:13	231:24	229:22 230:5	241:25 255:4	258:11
234:2,5 238:3	<b>combination</b>	230:11	<b>complaints</b>	<b>confident</b>
<b>clicked</b> 190:8,23	106:21	<b>common</b> 43:2	69:13	212:21 278:18
194:12 195:1	<b>come</b> 12:22	94:3 142:7	<b>complete</b> 243:11	<b>confined</b> 169:21
<b>clicking</b> 198:12	68:15 81:11	196:20 224:15	<b>completed</b>	<b>confirm</b> 67:23
<b>climb</b> 39:22,24	93:13 99:14,21	226:8 288:7	232:21 272:20	210:24
41:7	101:9 108:8	291:8	<b>completely</b> 72:6	<b>confirmed</b> 67:24
<b>climbing</b> 40:3,6	113:23 122:24	<b>common-kno...</b>	<b>compliance</b>	<b>connected</b> 84:11
40:8,10	132:12,12	225:12	306:17,19	202:18,18
<b>close</b> 6:24	172:20 185:13	<b>communicate</b>	<b>Complies</b> 239:21	<b>connection</b>
156:16 164:15	186:19 204:14	98:17 294:6	<b>comply</b> 244:6	33:13 75:13
213:23,25	209:14 226:22	<b>communicated</b>	<b>complying</b>	179:18 188:4
214:8 248:8,15	243:22 263:7	231:16 281:12	243:18	199:22 249:7
<b>cloud</b> 44:10	266:11 276:14	288:23	<b>computer</b> 32:14	271:6
156:17,19	292:12 300:8	<b>communicates</b>	119:18 196:9	<b>conquer</b> 105:18
157:9,12,18,19	<b>comes</b> 82:14	217:17	197:3,5 198:18	<b>consciously</b>
159:17 160:20	98:24 104:23	<b>communicating</b>	212:1 294:18	214:17
160:25 161:4	130:1 131:6,7	42:24	<b>concept</b> 121:24	<b>consider</b> 134:23
161:11,12	156:24 172:21	<b>communication</b>	151:1 289:6	258:2 271:3,5
163:12,19	180:25 280:9	99:6 183:12	<b>concern</b> 230:20	293:19,24
178:19,24	303:19	245:11	266:2 286:13	<b>considerable</b>
180:25 182:1	<b>comfortable</b>	<b>communicatio...</b>	<b>concerned</b> 13:7	55:12
182:18 216:25	164:1	107:22	66:7 241:1	<b>considered</b> 59:3
<b>clue</b> 80:13	<b>coming</b> 9:8	<b>company</b> 1:7	297:15	<b>consistent</b>
206:12	10:10,12,19,21	22:17 23:23,24	<b>concerns</b> 8:8	269:23
<b>Clyde</b> 27:20	10:24 11:12,20	23:25 24:3	<b>concert</b> 131:24	<b>constantly</b>
58:7	12:13,18 13:9	210:5 245:13	<b>CONCLUDED</b>	150:25 269:25
<b>coach</b> 21:1,21	13:10 41:16	245:22,23	305:13	<b>consult</b> 226:1
228:20	42:12,14 61:6	<b>company's</b>	<b>conclusion</b>	<b>consultant</b> 45:18
<b>Coast</b> 240:7	67:14 78:18	261:12	111:22 235:15	<b>consulted</b>
<b>Code</b> 4:6 306:21	87:17 90:15	<b>compare</b> 120:17	<b>concrete</b> 279:20	225:23



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

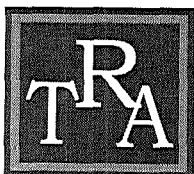
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>consume</b> 155:8	<b>contractors</b>	304:17,20	232:6 233:7	301:19 302:18
<b>consumption</b>	105:9 227:15	<b>conversations/...</b>	268:21	<b>cost</b> 229:18
130:8	227:21	78:7	<b>copied</b> 198:13	<b>coughing</b> 155:14
<b>contact</b> 97:13	<b>contracts</b> 51:1,3	<b>converter</b> 70:11	198:14	<b>counsel</b> 4:4
144:5,6 145:1	<b>contractural</b>	84:12 88:8	<b>copies</b> 64:7	306:24
145:1 147:6,7	306:20	92:15 106:13	68:14 69:11	<b>couple</b> 12:5 18:1
147:15,16,19	<b>contrary</b> 283:14	107:8 108:23	78:13 186:13	19:4 78:13
148:2,3,4	<b>control</b> 18:23	109:16 111:25	189:19	164:10 211:21
182:11 263:8	51:13 66:9,10	112:17,24	<b>copy</b> 14:7 19:8	223:1 273:6
286:9,13	66:11,20 83:3	113:11,25	69:10 80:7	<b>course</b> 18:1
297:16,17	85:17 90:4	118:21 119:2	83:1 125:22,25	31:17 33:10
302:18,19	91:12 92:22	122:6,13	126:25 134:21	40:10,24 61:12
<b>contacts</b> 285:11	94:5 107:9	123:14,25	143:24 185:17	70:25 71:1
285:21,22	142:11 170:11	124:10 166:4,8	185:25 186:10	72:1 74:24
286:4	170:13,14,15	167:7 171:15	189:23 190:9	85:16 150:22
<b>contain</b> 18:20	170:20,22	173:17 174:7	199:1 209:18	217:16
<b>contained</b>	173:2 217:16	178:16 191:6	211:5,9 212:8	<b>courses</b> 217:25
196:18	254:3,11	195:16,25	212:10,12	<b>court</b> 1:1,14
<b>containment</b>	257:21 276:15	196:5 199:25	213:3 220:5,7	4:18 5:3 8:1,6
270:19,19,23	286:22 287:8	200:4 201:1	220:18,19	284:21 306:4
271:1,5,10,14	<b>controllable</b>	202:4,19	231:14,20	307:9
271:15,18	35:14 37:17	215:19 216:16	254:5,10	<b>cover</b> 47:3
<b>contend</b> 135:6	<b>controlled</b>	222:17 225:25	255:12,15	<b>covered</b> 123:16
<b>contended</b>	156:22	249:8 251:18	275:13	143:25 164:20
135:21 136:2	<b>conversation</b>	266:14,18	<b>copying</b> 198:12	<b>covers</b> 153:9
<b>contending</b>	11:3 13:1 99:3	270:24 271:7	<b>corporate</b> 18:12	<b>cowboys</b> 294:9
136:11	177:15,18	272:14 287:21	117:16 244:5	<b>crack</b> 124:14
<b>content</b> 218:19	178:11 199:8	<b>cool</b> 273:24	246:11,18,19	125:2 226:4
220:3	210:13 256:20	<b>coordinate</b>	248:14 305:3	250:11 268:1,4
<b>contention</b>	262:8 263:16	16:25	<b>correct</b> 34:14	282:16 283:17
134:12 244:23	278:2	<b>coordinating</b>	107:2 144:17	<b>cracks</b> 123:24
<b>contents</b> 198:14	<b>conversational</b>	118:11	201:4 306:13	124:10,20
<b>context</b> 150:19	7:25	<b>coordinator</b>	<b>correctly</b> 7:11	223:5 224:3
270:21	<b>conversations</b>	31:25 43:20	34:10	225:7 226:20
<b>continue</b> 209:5	9:14 95:8	48:9 75:5 95:7	<b>correspond</b>	250:13 266:23
256:19 267:1	128:16 177:8	95:15 171:18	236:2	267:2,22
<b>continued</b> 223:9	195:3 201:7	173:15 174:5	<b>correspondence</b>	269:20 270:14
<b>continuously</b>	218:18 219:16	175:14,19	108:9	282:20 287:20
54:22	219:22 223:24	186:2,10	<b>corrosive</b> 142:4	288:14 290:3
<b>contractor</b> 46:18	275:25 285:12	197:22 198:3	147:23,23	<b>crank</b> 224:11,13
50:4 180:5	285:16 287:13	206:6 228:24	155:2 301:17	224:17



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

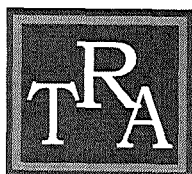
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>cranked</b> 252:23	35:15 37:10	235:18 246:13	134:5,6,10	200:3 209:24
<b>crank-up</b> 250:4	<b>cycle</b> 114:19	<b>dated</b> 78:16	140:22,24	<b>decided</b> 6:12
<b>crawling</b> 289:6	115:7,9	126:7 181:19	206:1,3 207:21	255:19
<b>create</b> 67:20	<b>D</b>	205:21 210:22	211:21 219:16	<b>decides</b> 104:23
75:15 98:25	<b>D 2:13</b>	235:25 307:3	223:1	<b>deciding</b> 33:2
186:21 212:23	<b>daily</b> 50:14	<b>dates</b> 18:23 52:4	<b>DCS</b> 50:16,20	199:23 233:5
<b>created</b> 42:2	54:20,21,22	123:19 127:5,6	51:25 53:9	<b>decision</b> 32:23
50:19 76:6,7,8	<b>damage</b> 144:9	198:9 291:8	54:11 55:1	32:25 39:20
76:11 85:9	147:10 149:16	<b>Dave</b> 28:4 32:8,9	<b>DE</b> 1:7	40:9,12,13
192:24 197:16	149:25 150:16	<b>day</b> 17:4,5 35:5	<b>deadline</b> 49:3,5	200:21,25
197:21	155:5	43:10 73:14	<b>deadlines</b> 62:1	292:20
<b>creates</b> 161:3	<b>Dan</b> 203:21,22	81:7 82:22	<b>deal</b> 32:17 75:18	<b>decision-maki...</b>
<b>creation</b> 76:13	204:1,11,12	83:2,10 96:24	85:11 116:3	58:20
<b>credentials</b>	227:16,20	100:15,18,19	127:10 132:6	<b>decomposition</b>
207:9,14	229:12 275:3	101:4 102:9	144:1 159:1	153:25
<b>Crestor</b> 8:20	275:11 278:7	113:6 114:7	186:22 210:6	<b>decreasing</b> 36:5
<b>Cromwell</b> 10:2	278:13 279:13	115:3,11 136:8	286:21,22	<b>deem</b> 303:3
10:23	279:13,15,17	139:9 140:4,5	<b>dealing</b> 7:9	<b>DEFENDANT</b>
<b>crossbones</b>	279:17,20	140:16,16,18	42:22 73:25	2:6
142:2,3 156:3	280:1,2,5,8	140:19,19,22	<b>December</b> 19:2	<b>defer</b> 150:7
<b>crosses</b> 230:24	282:14	150:21 157:24	45:20,21 46:5	<b>defined</b> 103:1
<b>cross-pollinati...</b>	<b>Daniel</b> 10:3	162:21 179:20	46:9 48:10,11	306:21
135:2	11:14,16	181:8 182:25	48:16 49:17	<b>defining</b> 116:20
<b>CSA</b> 156:13	<b>dark</b> 162:18	183:18,21,23	50:9 55:15,17	<b>definition</b> 103:1
<b>CT</b> 2:5	<b>Darren</b> 261:4,10	188:10 194:13	56:13,15 64:3	152:18
<b>Cullpepper</b>	262:13,16	195:22 211:18	71:8,9,9,14,19	<b>definitions</b>
264:6,10,17,24	263:13 264:5	229:11 251:3	72:23 75:11	159:14
<b>culture</b> 228:16	264:16	252:3,23,24	77:20,21 89:13	<b>definitively</b>
228:18	<b>data</b> 50:13,14	261:7 266:5,9	89:17 92:14	219:12
<b>curbing</b> 271:2	51:25 52:3	267:12,17	93:19 96:9,14	<b>degenerative</b>
<b>current</b> 45:17	63:5 65:18	269:9 271:23	99:5 123:14	39:13
179:18 246:10	87:25 120:9	272:14,23	137:11 158:1	<b>degree</b> 21:8,9,10
248:5,9 296:7	143:12 220:9	274:25 276:10	160:10 162:18	207:15,16
<b>currently</b> 5:19	220:15 260:14	279:5,18	163:9 165:6	<b>delivered</b> 189:8
<b>customer</b> 251:11	<b>database</b> 212:4	281:12,13	168:23 169:1	<b>delivery</b> 242:9
<b>cut</b> 32:23 33:5	237:23 238:2	293:7 307:3	172:6 216:20	<b>demands</b> 251:11
34:17 35:8,9	<b>date</b> 18:20,20	<b>daylight</b> 37:20	245:1 249:21	<b>demonstrate</b>
35:20,23 37:1	25:18 32:13	<b>days</b> 30:21 36:7	271:23 272:14	273:2,3,5
37:15 279:24	93:17 103:21	38:12,18 39:20	272:23 294:22	<b>demonstrating</b>
283:22 284:9	126:5,18 136:3	50:23 101:11	307:3	272:18
<b>cutting</b> 34:16	192:20,24	133:20,25	<b>decide</b> 21:20	<b>denial</b> 73:13



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

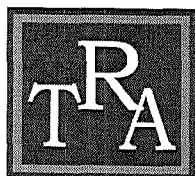
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>Denise</b> 210:5	274:11 276:3	<b>determine</b>	<b>direct</b> 73:19,22	254:18 291:4
<b>dense</b> 154:20	278:2,20 279:5	169:14,25	74:12 88:2	296:3
<b>department</b>	282:4,10 295:1	173:16,25	243:20 250:10	<b>dishonest</b>
22:20,22 62:13	295:12,15	174:6,12	<b>directed</b> 206:11	230:14
63:3 102:24,25	<b>DEQ's</b> 102:23	233:21	<b>direction</b> 22:1	<b>dishonesty</b>
182:22 183:6,8	<b>derive</b> 54:10	<b>determines</b>	42:12 138:6	230:17,18
183:24 185:7	<b>derived</b> 50:15	159:25	169:15 178:24	<b>dispatch</b> 285:24
185:10,16,25	238:3 240:14	<b>determining</b>	215:11 221:14	<b>dispute</b> 70:4
<b>depend</b> 293:7	<b>describe</b> 16:4	285:3	306:12	71:7,11 72:14
<b>depending</b> 55:11	178:18 202:10	<b>developed</b> 275:8	<b>directs</b> 243:1,1	72:25 138:11
101:25	<b>described</b>	275:21 276:25	244:9	154:16 157:16
<b>depends</b> 162:3	136:18 184:24	278:11 280:11	<b>direct-dial</b> 86:16	157:20
<b>deposed</b> 69:24	216:6 234:4	281:9	<b>dirty</b> 129:10,14	<b>distance</b> 157:12
<b>deposition</b> 1:10	302:23	<b>deviation</b> 127:16	<b>disagree</b> 154:5,6	<b>distribution</b>
4:4,15 6:25 7:7	<b>describing</b>	232:19 233:17	<b>disciplines</b> 105:5	6:23 42:9,10
7:13,15,18 9:3	161:11	233:23 234:11	<b>disconnect</b> 91:17	43:1 44:9
13:8,10,15,24	<b>desert</b> 157:10	235:6 259:5	<b>discouraged</b>	248:4
17:5 68:5	303:15	<b>deviations</b>	205:7,8	<b>DISTRICT</b> 1:1
79:13 125:20	<b>designated</b>	232:23 246:5	<b>discouraging</b>	1:2
125:24 126:3	31:25 53:8	<b>Devlin</b> 12:6	204:17	<b>disturbed</b> 163:6
142:25 210:24	121:9	<b>diagnosis</b> 209:1	<b>discover</b> 124:6,9	<b>ditch</b> 67:7
211:23 284:4	<b>designating</b>	<b>dialing</b> 35:17	291:10	<b>ditches</b> 53:23,24
302:7 305:13	129:23	<b>different</b> 42:13	<b>discovery</b> 124:2	<b>divide</b> 105:17
<b>DEQ</b> 63:2 78:18	<b>desk</b> 11:17	42:14 46:16	124:5,24	<b>doctor</b> 134:14
79:5 81:12	<b>detached</b> 195:1	48:5 49:2	<b>discuss</b> 234:13	137:12 149:11
82:14 84:10	<b>detail</b> 15:17	70:25 82:4	269:6	208:24 209:13
91:11 93:1,20	73:16 291:14	84:2,4,5 101:9	<b>discussed</b> 9:6	261:22,25
94:5,25 95:4	291:17	105:12 127:13	10:24 11:12	<b>doctors</b> 132:11
95:25 96:3,9	<b>detailed</b> 61:23	148:22 240:4	40:16 75:16	<b>document</b> 16:6
96:12,16,22,23	62:4 106:14	248:19 295:22	110:10 242:22	18:22 68:10,13
97:15 98:2,7	299:15	296:1 297:21	285:6 297:12	78:15 79:19
98:24 99:4,6	<b>details</b> 291:13	301:22 303:22	<b>discusses</b> 213:10	85:8,20 95:8
99:14 100:2,12	291:16,20	<b>difficult</b> 16:12	<b>discussing</b> 74:22	95:13,25 96:22
100:13 101:6	<b>detect</b> 156:11	<b>dig</b> 212:5	<b>discussion</b> 9:24	97:2,21 98:10
102:17 103:17	159:7,9,13	<b>digestive</b> 155:6	9:25 10:18	98:23 100:9
104:21 108:18	<b>detecting</b> 159:5	155:10	96:2 176:18	110:22,25
108:20 110:11	<b>determination</b>	<b>digging</b> 46:3	177:14 178:11	111:1 116:12
111:7 112:14	174:15 209:19	119:12 190:3	201:17 225:5	117:7 142:20
114:4 195:19	209:21 233:7	194:14 263:5	267:7 297:4	181:14,17,21
227:1 254:8,13	<b>determinations</b>	<b>diminished</b>	<b>discussions</b> 84:9	181:23 186:21
255:10 258:12	249:7	284:11	126:3 201:13	187:12 188:15



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

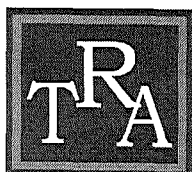
Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



190:7,18,19	118:19 119:9	147:25 148:13	<b>driven</b> 162:24	57:10,19,21,23
191:14 192:1	176:19 186:24	<b>DOT</b> 240:6	<b>driver</b> 245:5,8	58:24 67:1,18
192:23 204:22	187:20 188:25	<b>double-check</b>	<b>driving</b> 140:10	68:20 69:22
205:15,18	190:11,16,17	62:9 130:20,21	182:17	70:6 81:18
210:17 211:3,6	191:3,4 192:5	132:20 134:18	<b>drop</b> 147:22	86:16,22 88:10
231:2,5,10	193:7 194:23	161:13 181:10	148:4,4,19,20	88:11 89:12,16
234:15,17,22	195:4,18,21	221:15 233:19	148:20,24	91:14 92:12
235:9 236:19	196:18 197:15	258:10 275:19	<b>dry</b> 36:19	93:2 98:3,8
241:20,23	197:20 200:15	<b>doubt</b> 120:13	<b>DSF0000267</b>	102:10 103:5
242:1,3,10	200:22 202:9	139:3 148:15	246:6	106:5,22 107:5
244:5,7 245:25	202:13,16	196:23 203:25	<b>DSF09</b> 237:2	108:22 109:15
246:3,12,14,17	203:6,9 247:12	220:12,12	<b>DSF10013</b> 79:16	111:8 112:22
247:16,25	249:6 265:6	226:25 227:2	<b>DSF1013</b> 14:6	113:10 118:16
248:13 249:1	<b>doing</b> 21:3,25	229:20	<b>DSF13</b> 79:14	120:22 121:13
253:11 258:23	26:12 33:21	<b>download</b>	<b>DSF16</b> 186:25	122:25 123:3
260:15 277:21	43:24 45:11	198:25	<b>DSF267</b> 127:17	127:15 128:2
277:24 280:21	47:6,8,9 48:2,3	<b>Dr</b> 209:8,10,11	<b>DSF74</b> 181:18	133:18 134:8
280:23 304:25	48:17,20,25	<b>Draeger</b> 158:8	<b>DSF83</b> 186:25	141:10 143:5,9
<b>documentation</b>	49:3 50:10	158:10,13,19	<b>dual</b> 21:12	143:15 147:5
41:19 42:5	63:1 67:12,15	158:22 159:1	<b>ducts</b> 173:17	147:12,24
88:21 97:4,5	74:2 80:18	159:12,19	<b>ductwork</b> 70:12	148:1 156:5
108:7 111:16	107:1 114:13	168:13,17,18	107:8 108:24	158:5 159:24
168:6	116:18 122:25	168:19,20,21	113:11 171:16	163:18 164:17
<b>documented</b>	123:3 135:13	168:22 169:1,7	200:5 201:2	164:22 165:2
99:7 111:7	135:15,16	169:11 230:23	222:18 271:13	165:10,21
126:2 257:7	137:2 176:4	<b>drain</b> 275:8,16	<b>ductworks</b>	166:6,11,21
<b>documenting</b>	204:3 205:7	275:21 276:11	202:6	167:2,16 169:1
109:25 110:9	207:7 221:11	277:1,12 278:3	<b>due</b> 55:8 73:12	169:14 170:5
<b>documents</b>	223:9 227:15	278:12,16	129:12 250:7	174:11 176:4
13:22 14:12,14	261:11 264:3	279:16,21	<b>duly</b> 5:2 306:7	177:1,8,10
14:15,24 15:17	276:1	281:2,9 283:9	<b>dumped</b> 68:16	179:23 180:7
17:9,16,18,20	<b>door</b> 81:11	<b>drastic</b> 35:20	231:19	185:15 186:20
17:21 18:20	177:16	<b>drawer</b> 114:21	<b>DuPONT</b> 1:7	186:22 194:3
78:11 85:10	<b>dosage</b> 144:15	<b>drawings</b> 166:14	5:22 12:10	194:17 196:21
87:20 95:6,11	145:17 147:18	166:18,24	15:19 16:13	196:23 199:23
97:24 99:8	147:20 148:9	167:2,17	17:14,19,22	200:2,20,24
105:20,25	148:15	<b>drift</b> 42:6	18:2,4,13 19:8	204:11,14
107:15,17,19	<b>dosages</b> 146:17	<b>drifting</b> 178:19	25:17,18,21	205:24 207:8
108:11,16,20	<b>dose</b> 145:15,23	<b>drink</b> 65:4	27:5 28:23	207:19 221:18
110:6,14 117:2	146:22,25	<b>drive</b> 196:20	42:21 43:23	229:22 237:25
117:10,18	147:7,8,16,17	199:2	44:17 46:24	242:22 243:5



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

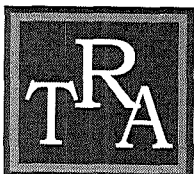
Baton Rouge, LA  
225.751.0732

225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

244:14,24 245:16 246:16 248:6 249:5 257:7 265:23 267:24 268:10 268:22 271:25 278:11 285:15 291:25 294:2 301:23 305:3 <b>DuPonter</b> 46:22 46:23 102:11 <b>DuPont's</b> 146:1 146:3,9,11,12 148:12 <b>duties</b> 170:9 <b>DVR</b> 260:12	162:2 199:3 <b>east</b> 83:18,19 <b>edema</b> 155:18 155:19 <b>education</b> 20:23 21:15 204:6 <b>Edwards</b> 28:4 <b>effect</b> 249:20 <b>effects</b> 138:15 151:5 297:6,12 <b>effort</b> 71:4 269:23 277:20 <b>efforts</b> 72:5,7 118:11 123:5 224:2 225:24 <b>eight</b> 82:7 157:16 <b>either</b> 7:8 122:19 156:19 206:15 214:19 215:7 233:25 249:5 266:19 <b>Either-or</b> 139:19 <b>EI</b> 103:8 <b>elected</b> 286:3 <b>electronic</b> 191:11 212:24 <b>elementary</b> 164:5 <b>eligible</b> 6:3,8,9 6:10 <b>Elizabeth</b> 10:1 104:10 259:16 259:17 287:11 287:11,12 <b>else's</b> 263:5 <b>embedded</b> 231:18 <b>emergency</b> 38:15 90:9 105:10 138:7	183:14 <b>emissions</b> 87:1 <b>emit</b> 154:1 <b>emitting</b> 154:19 169:16 <b>employed</b> 5:19 5:21,23 <b>employee</b> 46:24 131:23 158:5 243:11 244:9 244:12 <b>employees</b> 130:24 137:22 138:10 164:1 204:17,23 221:18 242:21 242:22 264:18 <b>encountered</b> 260:21 <b>ended</b> 83:21 129:15 255:5 <b>ends</b> 158:19 <b>engineer</b> 120:15 167:19 194:4 203:19 204:4,9 300:9 <b>engineering</b> 18:9 166:10,16,21 199:19 <b>Engineering-t...</b> 166:13 <b>engineers</b> 223:15,20 <b>English</b> 20:23 21:11,16 <b>enjoyed</b> 6:14 <b>entails</b> 262:19 <b>enter</b> 284:23 <b>entire</b> 216:22 <b>entitled</b> 1:13 246:4	<b>environment</b> 44:25 47:4 68:25 121:8,19 142:15 202:23 203:2 226:3 228:10,15 273:19 288:5 <b>environmental</b> 31:25 32:4,10 46:1,8,25 47:8 47:9 48:8,17 52:24 54:18 55:8 60:25 62:13 63:3 75:5,11,12 81:15,21 89:11 90:12 91:15 92:8 95:7,15 95:16 97:14 115:2,12 118:4 119:13 120:7 121:12 127:16 128:5 163:19 164:23 165:3 165:11 171:18 171:23 173:15 173:24 174:4 175:14,19 186:2,9 190:4 192:9 194:17 197:22,25 198:1,2 228:21 228:24 229:10 229:22 232:6 232:19 233:6 233:16,23 234:9,11 235:5 238:9 240:25 246:5 248:4 249:4 252:9 259:5 265:23	268:21 284:8 286:13 288:13 <b>environmental...</b> 227:5 274:5 <b>EPA</b> 62:19,21 63:4,19,25 165:18,19,22 167:21,25 171:17 172:4 172:15 173:19 174:9 175:23 195:19 285:13 285:13,16 295:12,14 <b>equipment</b> 92:16 123:13 137:20 167:12 167:23 174:7 216:19 226:4 230:21 252:9 265:25 266:23 271:16 273:14 <b>escaping</b> 161:17 161:20 <b>ESQ</b> 2:4,8 <b>established</b> 168:3 278:25 <b>estimate</b> 241:13 <b>ET</b> 1:4 <b>evening</b> 13:18 276:7 <b>event</b> 134:2 150:23 184:23 230:18 <b>eventual</b> 33:8 <b>eventually</b> 40:16 62:19,20 81:6 121:21 123:10 130:15 132:12 255:3 <b>everybody</b> 9:13
---	--	--	---	---



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

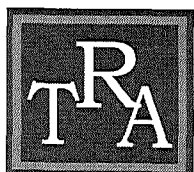
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

28:9 30:1	220:24 231:3,6	133:15,19	<b>face</b> 139:9,22	143:14 147:4
31:19 50:22	234:23 235:1	135:11 137:12	140:5,6,7,11	156:11 157:4,8
109:17 111:12	235:10 236:3	137:16 145:13	140:18,23,25	157:9,14,19
130:11 218:23	241:21,24,25	149:12,15,24	151:19,24	160:19 161:8
224:8 227:23	244:18 246:1,4	150:15,22,24	152:7,17,19,21	165:2 166:6
231:19 291:21	247:18,23	151:18,24	214:14	167:1 172:12
<b>everybody's</b>	248:1,20,25	155:21 158:18	<b>facility</b> 86:9	174:14,16,19
197:12	249:2,6 302:6	168:2 208:11	166:11	175:9 185:10
<b>evidence</b> 4:16	304:9,10	244:25 297:20	<b>fact</b> 9:8 10:18,24	195:18,20
110:4 288:18	<b>Exhibits</b> 3:1	297:21 298:7	32:18 65:7	196:25 197:12
<b>exact</b> 248:13	203:16 204:13	299:1,9 304:1	73:12 91:4	198:6 204:10
302:12	<b>exist</b> 202:14	<b>extent</b> 72:17	136:7 167:21	206:13 209:18
<b>exactly</b> 87:6	<b>existing</b> 50:19	109:8 144:13	206:15 304:22	212:3,6,11
111:11 112:5	193:24	164:24 165:4,8	<b>facts</b> 69:16	223:22 239:10
125:1 223:21	<b>expect</b> 209:12,14	285:3	110:3 288:17	256:16 275:24
246:24 258:6	<b>experience</b>	<b>extra</b> 118:8	<b>failure</b> 122:1,2	286:25 288:10
273:4 280:17	57:11,16 250:8	187:9 229:18	<b>fair</b> 124:17	296:7,10,24
<b>EXAMINATI...</b>	289:23 298:13	<b>eye</b> 144:5 145:1	132:23	297:10 298:18
2:15 5:5	301:11,12,16	145:21 147:15	<b>faith</b> 263:8	300:12
296:19	<b>expert</b> 102:8,14	147:19 148:3,4	<b>fall</b> 111:23	<b>fare</b> 21:14 30:20
<b>examined</b> 5:4	144:14	148:20 302:18	<b>falls</b> 108:12	40:7 41:14
<b>Excel</b> 198:19	<b>explain</b> 40:24	<b>eyes</b> 144:10	<b>Faltermann</b> 28:3	59:19
199:12	42:13 199:15	149:4 215:6	<b>familiar</b> 17:10	<b>fashion</b> 82:10
<b>excerpts</b> 15:19	209:20	261:9 303:5	69:16,19 83:8	289:14
<b>excessive</b> 160:11	<b>explosion</b>	<b>eyesight</b> 162:3	100:4 127:20	<b>fatal</b> 155:17
<b>exchanging</b> 15:5	238:23	<b>e-mail</b> 13:18	137:17 150:9	<b>favorite</b> 116:3
<b>excuse</b> 32:7 98:6	<b>exposed</b> 128:1	15:18 16:9,18	156:4 173:1	<b>feature</b> 90:7
104:18 115:6	134:13 135:22	111:13 126:11	197:11 240:1,6	<b>February</b> 130:1
183:11 284:2	136:2,12,19	127:8 189:10	240:9,11,19	131:7
<b>exhibit</b> 16:7,10	137:3,4 138:23	189:20 195:2	243:2	<b>Federal</b> 304:10
79:13,20	139:4,17,24	196:2,3 199:4	<b>far</b> 41:17 42:9	304:11,15,18
117:12 127:12	141:3 208:17	204:22 211:10	47:23 53:18	<b>feel</b> 58:18 82:20
142:21,24,25	209:9 210:4,6	211:14 231:17	64:8 70:24	164:1 211:19
144:24 145:6	210:10 217:6	231:19 232:3	71:2 77:13	293:15
146:4 154:12	217:19 221:18	255:24	90:13 96:21	<b>feeling</b> 149:8,10
181:15,18	245:6,8 288:6	<b>e-mailed</b> 255:22	110:12 111:10	<b>feet</b> 202:17
188:13,14,16	298:19,19	<b>e-mails</b> 111:9,10	112:18,22	203:3,10,12
188:20 189:23	299:12 301:13	111:22 211:11	113:9,18,19	<b>fellows</b> 43:9
190:1 205:16	<b>exposure</b> 128:11	212:5	118:11 126:13	<b>felt</b> 141:5 201:16
205:19,20	130:22,23	<b>E.I</b> 1:7	130:22 133:14	278:18
210:18,21,21	132:6,22		133:16 137:25	<b>fence</b> 230:22,22
		<b>F</b>		



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

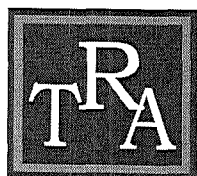
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

230:23,24	<b>filter</b> 158:15	79:10,12 87:7	<b>flow</b> 255:4	<b>forgot</b> 32:9
<b>fences</b> 44:13	<b>final</b> 107:12	95:21,22 97:7	<b>flowed</b> 51:14,15	43:18 181:8
<b>field</b> 76:21	110:9,22 111:2	103:11 104:1	<b>flows</b> 51:12	<b>form</b> 4:13 72:16
105:15 106:20	111:5	107:22 108:21	53:15	78:16 82:9
118:9 253:24	<b>finally</b> 274:22	135:10 136:1	<b>focus</b> 84:22	98:2,7,25 99:1
<b>figure</b> 33:15	<b>find</b> 17:14 56:19	177:12 178:4	<b>focused</b> 61:17	109:8 136:14
243:23	81:9 87:9	178:11 194:11	<b>folder</b> 190:15	141:22 143:11
<b>figured</b> 63:1	89:21 96:7	195:8 196:16	199:3	149:18 172:4
<b>file</b> 87:13,21	143:3 153:17	206:2 207:20	<b>folks</b> 41:1 42:18	198:16,17
97:12,23,23	189:25 195:22	211:17,19	49:7 51:5	211:9 212:11
98:1 112:6	196:9 211:14	213:3 219:14	57:12 64:11,12	233:25 234:5
114:21,23	212:6,7,23	224:6 234:16	82:8 96:22,23	234:12,14
115:8 116:4,4	220:17	244:2 254:17	101:24 102:7	235:7,14 243:1
116:5 191:8,10	<b>fine</b> 127:8	254:21 261:5	109:23 129:13	243:2,12,18,25
191:25 193:22	<b>finer</b> 166:7	295:24 306:7	180:6 245:11	244:9,16
212:15,17,19	<b>finger</b> 76:17	<b>five</b> 62:8 82:6	254:13 260:20	253:16,25
212:23,24	133:24	131:11 241:15	261:13 263:8	274:9
237:21	<b>finish</b> 7:23 22:11	<b>five-minute</b>	278:2 282:15	<b>formal</b> 40:5 48:7
<b>filed</b> 69:14	55:24 65:2	234:18	<b>follow</b> 236:17	92:4,12 97:22
212:14	98:5 107:1	<b>five-year</b> 62:5	<b>followed</b> 75:19	98:1 143:25
<b>files</b> 47:20 108:5	197:18 210:8	131:12	75:20 129:16	<b>formalities</b> 4:8
112:7 190:4	216:18 282:18	<b>fix</b> 72:13 269:8	<b>following</b> 85:10	4:10
191:12 192:9	292:24	269:15 289:3,5	106:8 223:20	<b>format</b> 194:12
196:18 197:3,4	<b>finished</b> 21:6	293:6	255:2 256:15	306:17
198:1,1	71:16 279:25	<b>fixed</b> 38:7 72:25	256:19	<b>formation</b>
<b>filing</b> 4:11	<b>finishing</b> 227:22	73:6 223:5	<b>follows</b> 5:4	159:16
<b>fill</b> 76:15 130:8	<b>fire</b> 182:21	224:2 225:6	<b>follow-up</b> 93:9	<b>formed</b> 23:24
234:5 235:15	183:6,8,24	226:4,20,23	111:16 258:21	<b>formula</b> 199:12
244:8,9,15	185:7,9,16,25	250:12,14,20	295:2 296:14	199:15
<b>filled</b> 26:1 76:24	248:4	266:24 267:3	<b>Fontaine</b> 32:9	<b>forth</b> 306:9
83:25 85:20	<b>fireplace</b> 24:9,13	267:22 268:1,4	<b>Fontenot</b> 80:9	<b>found</b> 189:5,19
232:18 236:15	24:22 25:7,14	268:24 270:14	<b>food</b> 22:23	190:4,21
238:5,7,22	<b>FIRM</b> 2:4	289:3,4 290:7	<b>football</b> 21:24	194:13 198:5
243:4,25 254:5	<b>first</b> 5:2 11:21	290:8,10,11,14	21:25 22:2,5	287:20 288:14
<b>filling</b> 61:7	19:8 23:9	293:12	39:9	290:3
234:9 237:8,12	28:11 43:5	<b>fixing</b> 46:13	<b>force</b> 261:14	<b>foundation</b>
237:20	63:15 70:17,19	169:21 222:16	<b>foregoing</b> 306:9	298:4,10
<b>fills</b> 236:14	75:14,16,25	<b>flip</b> 235:17 236:5	<b>foreign</b> 17:11,12	<b>four</b> 22:9 82:3
244:12	76:5,10 77:2,4	<b>floating</b> 161:4	<b>forever</b> 206:9	101:12 187:24
<b>fill-in-the-blank</b>	77:8,14,17	271:4	<b>forget</b> 7:25	241:13,15
65:21	78:3,15,21	<b>Florida</b> 24:15,16	255:24	246:9 278:25



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

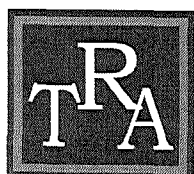
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>fourth</b> 241:7	184:11,16	213:21 214:4	<b>general-knowl...</b>	101:3,23
<b>frame</b> 38:12	185:2,4,6	214:14,20	225:9	118:19 127:5
72:8 93:18,22	<b>Gary</b> 104:18,19	215:2,9 216:5	<b>generate</b> 53:8	136:3 177:23
99:20 128:12	118:12,15	216:8,24 217:6	208:20	179:6 187:7
162:11	<b>gas</b> 31:22 32:18	217:18 221:18	<b>generated</b> 52:6	256:4 278:6,9
<b>Fred</b> 262:2	32:21 35:25	230:24 241:1	63:23 64:8	280:22 295:8
<b>frequencies</b>	36:1,5,23	244:13,24,25	65:19 83:5	300:9
290:17	69:21 70:2,5,7	245:6 249:7	147:5,13,24	<b>given</b> 6:25 38:3
<b>frequency</b>	70:8,10,13,18	257:3 260:21	<b>generates</b> 66:24	42:11 45:9
116:24 120:25	71:21 73:23	268:9 270:21	246:20	46:4 48:11
<b>Friday</b> 9:4 11:13	74:1,8,13,18	271:6,24	<b>generic</b> 67:16	58:2 109:23
13:2,18 211:22	75:13 77:6,22	272:13,16,19	69:6	132:11 157:24
224:10 261:8,9	78:4,22 88:7	272:25 273:10	<b>gentleman</b> 23:7	170:5 194:16
<b>Friedler</b> 24:4	89:8,25 90:15	273:15,17	26:11 29:14	195:19 221:5,7
<b>front</b> 81:11,12	92:12,14 96:1	288:5 293:24	32:7 48:19	272:14
182:18 225:11	99:8,11 114:14	295:13	78:18 80:10	<b>gives</b> 53:10
265:6	120:3 128:1	<b>gases</b> 137:23	105:16 262:1,3	121:24
<b>full</b> 5:8 140:7	132:5,22	154:1	<b>gentleman's</b>	<b>giving</b> 125:24
151:19,25	133:14,19	<b>gate</b> 180:5	23:11	265:5
152:11,17	134:13 135:22	<b>gather</b> 14:1	<b>gentlemen</b> 79:6	<b>gloves</b> 151:20
213:3 264:23	136:2 137:4,12	50:23 276:2	79:22 90:19	152:1,20,23
<b>fully</b> 293:24	137:16 139:17	<b>gathered</b> 14:3	93:12	153:6,7,7
<b>full-acid</b> 152:9	141:3,13,16,22	51:6,24,25	<b>George</b> 10:1	213:14 214:7
152:12,15,19	141:24 149:5	53:2	31:9 285:20	<b>go</b> 8:11 15:6,17
152:22 153:6	156:1 157:4	<b>geared</b> 61:19	286:19	19:2,20 20:6
214:6	160:2 161:4,11	66:8 102:18	<b>Germany</b>	20:13,16 23:13
<b>full-face</b> 152:7	161:16,23	122:2 271:14	158:14	25:15,25 37:23
152:14,19,23	162:25 163:9	<b>Geismar</b> 182:10	<b>getting</b> 7:24	49:6 53:3,24
214:6	163:20 164:2	<b>Gene</b> 27:19	44:19 46:6	59:2 61:8,13
<b>fumes</b> 154:20	169:14,15,15	237:5,6 264:6	69:5,6 128:1	62:11,16,19
<b>function</b> 194:2	169:18,25	264:8	141:9 200:21	63:15 72:18
228:24	170:1,6,18	<b>general</b> 44:20	211:22 252:25	74:14 79:9
<b>functioning</b>	171:5 174:1	45:25 58:19	288:6 299:15	84:7 87:3,25
39:16	176:20 177:9	78:2 84:20	<b>giant</b> 160:20	92:4 94:21
<b>further</b> 112:4	178:18 180:22	242:19	<b>Gilbert</b> 264:6,8	95:12,23 96:11
153:1	192:12 195:15	<b>generalities</b>	<b>girl</b> 81:12	97:10 100:24
<b>G</b>	199:24 201:1	225:14	<b>give</b> 7:6,13 8:16	101:15 103:14
<b>gallon</b> 156:25	202:10 204:24	<b>generally</b> 7:17	15:6 19:22	103:24 106:6
<b>Gamma</b> 182:8,9	205:9 208:11	7:19	47:20 67:5	106:16 113:2
182:12 183:9	208:13,17,18	<b>general-duty</b>	68:5 73:15	113:15 119:11
183:10,12	209:9 213:19	42:16	80:7 93:17	119:25 120:9



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

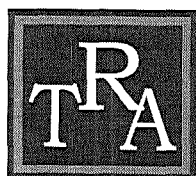
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

123:20,23	289:3,6,9,21	273:25 276:22	180:19	143:18,24
124:14,15	290:14 292:5	283:18 292:22	<b>Greener</b> 47:13	149:9 150:5
131:12,17,19	292:25 293:1	297:13,20,23	<b>Gregoir</b> 30:13	155:8,21 162:3
132:10,18	294:8 296:1	297:24 298:7	<b>Gregory</b> 80:10	162:10 198:25
134:18 137:5	301:15	<b>Gonzales</b> 5:11	80:22	215:15 228:21
138:6 143:7,8	<b>goes</b> 63:4 86:2	<b>good</b> 5:6,7 18:2	<b>gross</b> 155:21	232:2,12
149:11,19	99:22 131:7,23	25:3 28:8	<b>ground</b> 303:17	238:15 248:10
153:1 157:12	177:3 182:13	30:17 42:1	<b>groundwater</b>	255:3,22 264:1
161:13 169:8	246:21 255:5	47:17 80:14	49:13,14 64:19	268:20 276:10
170:22 171:9	273:19	125:11 157:19	65:16,17 66:3	292:5 301:21
175:11 181:9	<b>goggles</b> 152:8	172:11 177:6	66:4	<b>guessing</b> 29:23
183:4 185:16	<b>going</b> 18:17 25:2	263:8	<b>group</b> 14:16,18	44:19 49:19
185:20 186:10	40:25 41:6,11	<b>gotten</b> 16:21	26:12 79:10,11	141:4 198:4
190:6 197:10	42:4 43:13	111:2 186:13	89:7 101:9	<b>guide</b> 243:10
199:1 200:12	44:11 50:25	211:5 217:22	116:22 187:13	<b>guideline</b> 67:4
201:21,22	53:23 56:18,20	221:13 231:20	227:20 236:24	<b>guidelines</b>
209:25 210:5	57:18 63:2	264:4	237:11 247:11	306:18
214:11 215:13	67:3 69:22	<b>government</b>	261:14	<b>guinea</b> 146:22
216:10 217:10	70:2,6 71:4	65:20 89:7	<b>growing</b> 164:17	<b>guy</b> 23:12 28:1,2
221:15 223:3,9	74:2,23 78:9	<b>governmental</b>	<b>grown</b> 18:10	32:8 38:19
223:10,12,13	98:9 101:23	38:16 88:7	228:19	42:17 72:12
223:22,23	107:21 108:1	89:13,17 90:14	<b>guarantee</b> 9:19	79:7 80:11,17
227:24 228:7	112:4,11 135:2	91:9,15 92:1	<b>guard</b> 240:7	80:21 81:5,16
228:19 232:13	145:21 149:2	176:8	261:14	82:12 100:17
232:13 233:18	150:20 159:8	<b>government-a...</b>	<b>guards</b> 179:23	100:25 102:7
233:21 234:1,4	164:15 171:10	156:5	180:10 261:8	118:7,9 129:11
234:11,13	172:12 176:23	<b>go-to</b> 286:6	263:1 264:20	130:11 207:2
237:22 238:2	183:25 196:25	<b>grab</b> 116:2,4	<b>guess</b> 6:23 10:4	207:13 226:3
239:10 243:6,9	198:2 199:16	157:22	16:10 18:25	284:7,7,8
243:24 249:24	199:17 205:2	<b>grabbed</b> 114:23	19:22 24:10	288:13 289:12
252:3,9,19	214:11,13,22	115:7 116:5	39:21 40:10	293:13
253:1 254:1	215:17,18	117:7,9	42:18 44:24	<b>guys</b> 24:5 27:14
258:1,3,10,16	216:2,4 224:9	<b>grades</b> 158:17	45:9 50:17	28:6 31:18
258:21 260:19	224:12,17,18	<b>gradual</b> 35:18	60:7 65:22	37:12 76:21,22
263:4 265:24	225:13,19	35:19	79:10 80:23	79:12,25 82:6
266:5,9,11,20	226:15,18	<b>graduate</b> 20:10	83:18 85:18	83:6 87:10
267:9 269:8,14	228:4 229:8	<b>graduated</b> 21:6	91:13 95:24	93:10 104:14
269:19 273:25	234:6,25	<b>grass</b> 47:13	99:12 106:18	117:25 118:10
274:8 275:19	247:18 250:20	<b>great</b> 14:9 15:23	109:11 116:8	129:12 140:19
276:17 279:3,7	252:16 254:1	21:23	124:23 129:1	180:9 185:12
279:10 280:16	268:9 269:21	<b>Green</b> 180:15,15	134:20 139:1	206:19 207:1



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

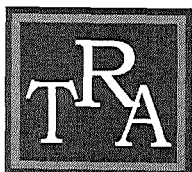
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

242:5 254:7 257:15 269:18 291:20 292:5,6 292:12 293:6 <b>G4S</b> 180:1,2	177:16 179:2 199:16,17 208:6 209:3 224:9,19 227:25 291:9 291:23 292:24	<b>hazards</b> 138:19 144:25 147:14 302:21,22 <b>head</b> 8:5,24,25 28:6 63:16 87:19 148:17 238:25 287:16 303:6 <b>headed</b> 9:15 83:19,20,21 <b>health</b> 6:22 18:9 44:25 45:11,12 45:15,23 47:4 47:7,10,18 57:9 68:25 121:7,12,19 128:7 142:15 163:18 174:20 186:2,9 202:22 203:2 226:3 228:10,15 229:10,21 232:6 252:8 261:13 265:22 268:21 284:7 288:12 289:11 297:12 <b>healthy</b> 227:5 <b>health-safety---</b> 121:10 <b>hear</b> 25:21 136:21,23 150:13 185:13 222:23 251:13 251:15 261:15 263:19 267:6 277:10 280:13 280:14 296:2 <b>heard</b> 60:4 135:10 137:3 137:10 138:22	158:8 163:22 201:21 205:14 209:8 210:4,6 250:9 258:4,6 262:4 263:9,18 263:22 268:16 268:25 269:3 277:11 278:16 278:19 280:16 280:17 281:17 283:4,8,11,13 283:15 298:17 <b>hearing</b> 100:1 131:21 139:21 152:13 254:3 270:12 <b>heater</b> 70:11 107:8 108:24 113:11 167:7 167:24 171:16 173:17 200:5 201:2 202:4 222:17 <b>heavy</b> 66:13,13 <b>heavy-enough</b> 157:11,18 <b>help</b> 7:21 8:1 30:14 56:3,4 91:23 204:10 234:9,17 235:4 243:18 294:1,3 <b>helped</b> 27:10 28:9 <b>helps</b> 8:6 <b>Herb</b> 60:4 <b>hereinbefore</b> 306:8 <b>hereto</b> 4:4 <b>hiccups</b> 224:21 <b>high</b> 20:6,7,8,11 20:14	<b>Highway</b> 5:11 5:17 164:6 <b>hint</b> 18:2 <b>HIP</b> 70:11,16 75:3 84:11 88:8 89:25 90:15 92:15 105:23 106:12 107:7,16,18 108:9,23 109:16 110:13 111:25 112:16 112:23 113:10 113:24 118:20 119:1 122:6,13 123:13,24 124:10 166:1,7 167:6 171:15 173:16 174:7 178:15 179:19 182:3 189:13 189:18 190:8 190:22 191:6,9 191:15,17,22 192:2 195:11 195:15 196:1 198:10 199:24 200:4 201:1 202:2,18 215:19 216:16 222:17 225:24 249:8 251:19 266:14,17 269:6 270:22 270:23 271:7 272:13 275:8 276:12 277:1 278:12 281:10 287:14,20 295:19 296:9 297:1,8
<b>H</b>	<b>h</b>			
<b>H</b> 2:4 <b>habit</b> 9:1 280:12 <b>habits</b> 30:18,18 <b>Hale</b> 20:8,8 <b>half</b> 108:21 <b>hallway</b> 131:4 <b>hand</b> 14:16 253:13 257:15 258:12 <b>Handbook</b> 199:19 <b>handed</b> 44:19 87:9 115:4 117:9 254:7,13 255:10 261:25 275:14,18 276:5,5,7 277:24,25 280:23 <b>handful</b> 188:10 <b>handheld</b> 169:18 <b>handing</b> 177:20 <b>handle</b> 43:3 82:21 116:15 116:16 274:4 <b>handled</b> 36:23 55:14 230:10 <b>handling</b> 82:18 151:8 <b>hands</b> 16:13 <b>hand-off</b> 47:22 <b>happen</b> 16:15 37:9 56:12 76:19 114:1	<b>happened</b> 41:8 44:12 56:13 73:12 95:9 100:19 108:18 122:21 155:20 174:17 208:25 251:14 254:2 301:15 <b>happening</b> 37:6 179:17 245:14 245:15 <b>happens</b> 122:23 141:19 150:23 229:9 266:4 269:21 273:9 <b>hard</b> 8:15 14:21 32:13 42:12 184:6,6 212:10 212:23 <b>harmful</b> 138:15 <b>Harold</b> 26:9 28:17 <b>Harris</b> 10:3 11:21 28:1 <b>Harry</b> 27:19 <b>hash</b> 135:4 <b>hate</b> 107:2 <b>hazard</b> 138:16 141:25 142:4,5 147:7,15,16 155:3,25 156:2 297:19 <b>hazardous</b> 43:22 142:10 144:5 144:25 153:24			



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

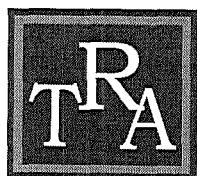
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>HIPPA</b> 128:16	171:3 217:11	203:12 221:17	<b>inches</b> 158:15	<b>industrial</b>
<b>hired</b> 25:16	218:5 251:17	251:6	<b>incident</b> 76:2	164:13 174:20
28:18 30:9,10	251:25 252:5	<b>identification</b>	93:8 161:2,3	<b>Industries</b> 22:17
46:10,12 64:9	265:16,19	16:7 79:20	161:10 181:22	<b>inflammation</b>
<b>hiring</b> 26:13	266:13,17	142:21 181:15	231:13 233:10	155:18
59:15,20	269:24 294:12	188:17 205:16	233:15 234:10	<b>influences</b> 288:5
<b>hit</b> 147:9 214:23	<b>hot</b> 251:3 269:25	210:18 231:3	235:6,12 236:3	<b>information</b>
<b>hits</b> 148:19,21	273:6,9,13	234:23 241:21	236:14 238:24	13:17,19 14:1
148:25 159:15	274:3	246:1 248:1	239:15 244:2	50:11 51:8,12
214:22 215:9	<b>hour</b> 85:3	249:2	244:13,15	52:19,20,23
<b>hold</b> 157:23	<b>hours</b> 9:5 13:2	<b>identified</b>	246:22 248:4	53:2 54:5,17
<b>hole</b> 125:2 226:4	38:9,10 130:22	144:25 191:17	249:14 259:11	64:17,18,19,23
268:1,4 283:16	135:17 146:23	<b>IH</b> 50:6	259:20,25	67:5 84:25
288:4,7	215:3	<b>III</b> 5:10	270:18 294:16	87:5,14 88:14
<b>holes</b> 68:15	<b>hour-and-a-half</b>	<b>illness</b> 129:24	294:17	113:6 119:17
123:24 124:9	282:13	<b>illnesses</b> 208:6	<b>incidents</b> 230:13	128:15 134:15
124:20 223:5	<b>house</b> 39:1 183:3	<b>immediate</b> 151:2	230:16	134:16 142:6
224:3 225:6	183:22	241:10	<b>include</b> 114:12	146:8,14,25
226:20 250:14	<b>Howard</b> 20:17	<b>immediately</b>	151:9 167:10	148:9,13
266:23 267:2	20:19,22 21:5	127:10 150:23	<b>included</b> 61:4	189:13,18
267:21 269:19	22:5 28:13	<b>impact</b> 255:13	141:19 152:16	193:5 195:1
269:20 270:13	31:4 103:6	256:5 284:1,5	<b>includes</b> 151:19	211:15 217:23
282:20 287:20	205:22 206:18	291:14	151:24 167:6	222:15,20
288:14 290:3	206:18,25	<b>impacted</b> 244:23	<b>income</b> 6:14	239:23 240:1
<b>home</b> 209:3	<b>Howard's</b>	<b>impacts</b> 230:21	<b>incompatible</b>	244:14 246:21
241:15	206:24	<b>Impala</b> 177:12	153:14,22	246:21,24,25
<b>honestly</b> 108:17	<b>how's</b> 121:22	177:13 179:12	<b>incompatibles</b>	255:4 256:20
133:10	<b>humans</b> 141:24	260:20 261:2	151:9	260:11 266:4
<b>hood</b> 153:3,4	151:5	261:15 262:14	<b>increase</b> 35:13	268:23 271:22
214:7	<b>hung</b> 128:17	263:11,14,20	<b>increased</b> 29:8	272:11 276:3
<b>hope</b> 163:23	<b>hunting</b> 131:24	264:11,18	35:3 67:6	276:19 277:21
179:2 226:17	<b>hurt</b> 22:12 39:8	<b>implement</b>	<b>increasing</b> 44:12	278:13 279:16
<b>hoping</b> 226:14	238:23	34:17 35:10	<b>indicated</b> 205:11	279:21 280:9
226:16	<b>Hut</b> 180:2	<b>important</b> 33:5	<b>indicating</b> 253:9	280:22 281:5,7
<b>hose</b> 167:10	<b>H-A-L-E</b> 20:9	<b>impression</b>	<b>individual</b> 58:4	281:22 283:13
168:10 171:1,9	<b>H.R</b> 26:12	80:20	60:9 103:3	283:16 286:10
202:11,17		<b>improve</b> 67:15	129:9 174:24	288:23 289:17
<b>hoses</b> 71:4 72:9	<b>I</b>	<b>improvement</b>	175:1 178:13	291:25 295:2,6
84:10,14,17	<b>Ian</b> 12:6	29:5	208:25	295:12 298:18
94:10,25 100:3	<b>IARC</b> 142:7	<b>inapplicable</b>	<b>individuals</b> 42:7	<b>informed</b> 134:3
114:12 163:11	<b>icon</b> 238:2	233:6	184:9 280:15	134:4 164:22
	<b>idea</b> 94:7 184:12			



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



165:3,11,21 167:22 185:22 275:12 <b>ingestion</b> 144:6 145:1 <b>inhalation</b> 138:16 141:25 142:4 144:6 145:2,22 146:23 155:3 155:16,25 156:2 297:18 297:19 302:19 304:5 <b>initial</b> 76:1 97:6 101:22 104:4,6 104:20 181:22 231:13 232:22 233:10,15 234:10 235:6 236:3 244:2,12 244:15 259:11 268:25 292:6 294:17 <b>initiate</b> 201:16 243:7 <b>initiated</b> 274:21 <b>injured</b> 22:11 244:25 263:2 <b>injuries</b> 130:3 208:5 <b>injury</b> 129:23 130:25,25 132:9,16 134:9 148:7 <b>inquiring</b> 254:16 <b>inquiry</b> 254:18 <b>inside</b> 141:20 170:10 290:15 <b>inspect</b> 109:5	<b>inspection</b> 15:7 <b>inspections</b> 223:8 <b>inspector</b> 118:9 278:6 283:2 295:1 <b>inspectors</b> 79:24 80:16 84:10 274:11,24 275:6 276:3,20 278:9,13 282:4 282:10 <b>instability</b> 153:13,15,21 <b>installed</b> 265:17 <b>instruct</b> 185:24 <b>instruction</b> 204:22 213:17 <b>instructions</b> 213:20 <b>instrumentation</b> 50:20 51:12 54:25 83:6 <b>insurance</b> 6:15 23:12,12,16 24:17 <b>intact</b> 122:4,6,14 <b>integrity</b> 104:12 105:9 122:3,5 122:13,15 <b>intend</b> 247:6 <b>intensity</b> 297:20 <b>interested</b> 307:1 <b>internal</b> 56:22 59:23,25 60:12 268:7 <b>internally</b> 148:23 <b>internally-cre...</b> 246:16 <b>internet</b> 143:4,7	<b>interpretation</b> 234:6 250:17 269:12,14 <b>interview</b> 26:5 56:17 78:15 79:1,2 253:25 274:9,10 <b>interviewed</b> 26:8 26:10 177:7 <b>intranet</b> 17:19 17:23 117:24 142:19 143:6,7 143:8 249:24 <b>introduced</b> 81:3 <b>introduction</b> 177:17 <b>investigate</b> 283:2 <b>investigation</b> 139:20,24 212:1 235:12 235:24 236:15 238:24 239:15 246:22 249:15 259:25 270:18 278:20 <b>investigational</b> 270:17 285:4 <b>invited</b> 261:18 <b>involve</b> 73:25 <b>involved</b> 42:21 46:6,17 59:15 62:7 76:13 109:4 125:5 183:19 201:6 215:14 222:12 237:8 239:5,15 250:5 256:22 274:3 286:19 286:25 287:7 291:2 296:3	<b>involvement</b> 74:12 77:6 112:16,19 168:9 <b>IPET</b> 296:4 <b>irritate</b> 303:5,9 <b>irritated</b> 149:5 <b>irritation</b> 145:21 148:7,14 155:12 303:8 <b>issue</b> 63:25 73:17 78:12 91:23 135:11 233:10 <b>issues</b> 10:13 42:21,23 43:1 74:25 112:8 115:2 118:4 122:16 127:23 135:3 179:10 282:25 <b>items</b> 127:12 <b>Ivy</b> 118:6,7,13 118:14 119:11 119:19 121:1 <b>I21</b> 53:10	<b>Jason</b> 80:9 <b>JCC</b> 114:19 <b>Jeff</b> 30:4,9,14 50:22 59:10,14 60:4 83:8 91:3 93:16 125:23 126:5 230:3,10 230:14 262:11 262:21 264:12 <b>JEFFREY</b> 1:4 2:11 <b>Jeff's</b> 17:5 126:3 230:2,19 <b>Jimmy</b> 31:6 40:22 58:2,8 59:24 60:20 <b>job</b> 13:5 22:21 23:7,12,21 24:17 25:1,3 25:10,14,21 26:14,19,20,21 26:23,25 29:2 38:14,17 39:4 39:6 40:1,18 42:17 44:5 45:6,11 46:21 47:1 48:18 50:8,22 55:18 56:19,22,25 57:4,5,17,19 57:25 58:1,24 59:4,7,12 60:8 60:12,19 61:1 73:21,25 74:15 75:11 77:12 90:12 92:9 114:18 115:6,9 120:7 129:20 142:14 170:5 173:14 174:3 175:13 176:4
---	---	---	---	---

## J

jail 86:2

JANE 2:4

January 46:4,7

55:17,20 60:25

73:21 74:10,17

75:12 81:14

89:23 90:13,25

92:9 103:12,13

174:4 193:18

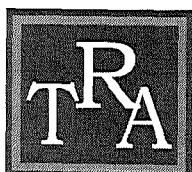
193:25 196:17

197:21 238:9

239:12,14

247:2 248:10

248:11



TORRES REPORTING &amp; ASSOCIATES, INC.

COURT REPORTING &amp; LITIGATION SERVICES

tra@torresreporting.com

www.torresreporting.com

Baton Rouge, LA

225.751.0732

225.752.7308 FAX

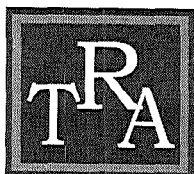
New Orleans, LA

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

186:20 194:2	<b>J.H</b> 2:4	<b>kicked</b> 32:9	8:9 9:19 12:21	118:23 119:6,9
199:22 207:14		43:25 44:8	12:22 13:10	119:24 120:21
209:1,2 228:7	<b>K</b>	<b>killed</b> 12:9 34:2	14:21 18:19	121:3 122:1,2
229:7 245:16	<b>KBR</b> 12:2 72:12	34:3	28:10,12 29:22	122:5,8,15,16
249:5 267:24	114:13 129:11	<b>kind</b> 7:9 14:1	30:18 41:8,24	123:1,20 124:1
288:14 292:13	130:11 217:10	17:10 26:1	43:19,24 47:11	124:2,4,8,19
292:24 293:13	217:18 218:2	34:17 35:9	48:13 49:22	125:1 128:12
293:17,20	<b>keep</b> 25:6 49:18	36:2 38:15	56:14,21,24	128:12 131:17
304:14	53:25 64:7	40:4 42:2 43:3	57:7,21 58:6,8	133:2,10,14,16
<b>jobs</b> 22:25 24:8	70:16 85:4	51:18 56:21	58:22 59:9,10	134:24,25
25:4 39:19	95:11 97:4	58:13 68:24	59:10,14,23	135:2,19,23,24
41:18 50:14	107:1 114:21	78:20 83:7	60:2,3,15,16	135:24 136:4
57:22,22 58:22	116:18,23	92:4 117:10	60:16,22 68:16	137:14,15
59:17,17,23	118:11 120:24	118:9 129:3	69:2 70:1 72:2	139:1,11,14
60:16 205:13	120:25 121:2,4	130:3 131:25	72:9,11 73:13	140:2,3,21,22
213:7 223:9	129:21 131:11	137:23 143:2	77:5,9,12,18	141:8,25 142:1
<b>Joe</b> 29:14,15,20	131:13,13	147:25 149:8	77:25 78:9,23	142:5,6,9,13
<b>Johnson</b> 261:4	142:15 186:16	157:1 172:4	78:24 81:4,9	147:4 148:12
261:10,20	197:13 212:16	175:2 198:17	81:24 82:7,11	148:15 149:8
262:5,13,16	237:21 270:10	227:23 256:20	85:3 87:4,10	149:10 150:6
263:13 264:5	292:10 296:8	288:22 289:7,8	90:13 91:2,4	150:14 153:6
264:16	<b>keeping</b> 17:17	291:16 305:3	91:11 92:17	154:5,6 155:7
<b>Jones</b> 27:18	42:9 50:12	<b>kinds</b> 97:2	93:3,8,14,25	155:9,20 157:6
<b>Joshua</b> 28:4	95:16 151:9	158:13 164:14	94:6,9,13,14	157:8 158:7,10
<b>judgment</b> 38:1	<b>keeps</b> 97:12	209:5 279:7	94:16,19,20,22	159:1,11
<b>judgments</b> 38:4	118:14	<b>knee</b> 39:6,8,12	94:24 95:3,20	160:15,16,17
<b>Jules</b> 27:25	<b>Kelsey</b> 231:17	40:25	95:21,23 96:21	160:20 161:7
<b>July</b> 41:9 231:8	<b>Kent</b> 60:4	<b>Knees</b> 22:13	97:11,12 98:4	161:24 162:1,2
231:22 235:18	<b>Kentucky</b> 26:11	<b>knew</b> 9:14 12:15	98:13 99:6,10	163:3,16 165:2
235:18,25	<b>kept</b> 44:9 50:17	12:16 77:14,16	99:24 104:1	165:8,14,17,24
<b>jump</b> 193:23	87:12 117:22	77:17 87:8	105:19 107:10	166:2,5,6,9
<b>jumped</b> 193:21	117:23 119:10	94:2 122:12	109:1,17,19	167:1,9,13
<b>June</b> 5:24 25:17	122:18 203:13	136:1,10,11,18	110:12,19	168:25 170:23
25:19 26:15	255:17 269:21	173:21 177:12	111:6,11,14,15	172:12 173:13
63:16,17 101:3	<b>Kerry</b> 46:10,12	185:5 190:6	112:6,7,11,18	174:11,14,16
101:4 103:13	46:15,18 47:11	224:12 225:5	112:21,22	174:25 175:9
210:22 211:6	48:6,8,13	226:17 255:6	113:5,9,18	176:10 180:13
211:20 212:13	49:11 180:14	256:16,17	114:16,20	180:18,21
218:19 220:20	197:9 237:4,5	276:5 279:15	115:3,6,8,24	183:2,3,4,10
236:8 237:17	<b>key</b> 33:9	279:17 283:4	115:25 116:23	183:21,23,23
237:17 238:14	<b>kick</b> 46:13	<b>know</b> 6:19,19	117:18 118:22	183:24,25
	175:15			



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

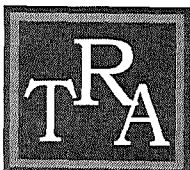
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

184:3,5,13,23	250:24 251:5,5	142:7 146:12	<b>landline</b> 38:25	258:23 259:2
185:2,3,4,8	251:21,24	170:24 205:6	86:21	265:11 268:9
191:4,25 192:1	252:1,6 253:13	224:15 226:8	<b>language</b> 176:22	271:2 272:25
192:4,7,8,17	255:14 256:5	250:10 252:18	<b>lap</b> 83:18	275:8,15,20,24
192:20 193:3,6	256:24 258:14	279:11 282:16	<b>Larry</b> 103:6	276:11,25
193:11,14	258:17 259:13	282:19 291:9	205:21 206:18	278:11 279:21
194:2,13 195:5	259:20 261:16	<b>knowledgeable</b>	206:18,23,25	280:10 281:9
195:6,10,18,20	262:17,19,19	167:16	<b>larynx</b> 155:18	283:1,6,8
196:24 197:1,6	265:13,15,16	<b>known</b> 93:24	<b>lasted</b> 206:9	284:5 285:1,3
197:9,11,14	265:19,21	133:23 134:1	251:3	285:5 294:21
198:4,6,7	266:12,15,16	141:24 169:4	<b>late</b> 32:11 71:17	<b>leaked</b> 71:21
199:10,11,13	266:19 267:21	172:5,7,8	122:11 123:15	<b>leaking</b> 71:3,8
199:17,19	267:23,24	184:4 230:13	141:7 221:24	72:2 119:15
201:15 202:13	268:3,5,5,8,11	245:3 252:16	<b>law</b> 2:4 4:7	120:6 123:14
202:15 203:11	268:15 269:6	<b>knows</b> 286:1,2	<b>laws</b> 176:16	170:25 171:5
203:12,13	270:5,6,7,8,13	294:12,23	<b>lawsuit</b> 134:25	216:19 225:7
204:1,10,25	270:15,25	<b>KUCHLER</b>	304:23	227:11 228:7
205:1,10	271:9 273:3,4	1:18 2:7	<b>lawyer</b> 14:22	252:10,13,16
206:10,13,15	273:9 275:17	<b>L</b>	<b>LDEQ</b> 108:7	266:1,23 267:3
206:16,17,23	275:18 276:17	<b>L 4:1</b>	112:5 253:16	267:22 270:14
207:15,25	276:19 277:8	<b>La</b> 61:9,11,12	253:25	271:24 282:20
209:7 211:8,10	279:2 280:8	<b>label</b> 16:10	<b>lead</b> 268:3	284:10 290:25
212:3 213:25	282:12 283:3	210:22	<b>leading</b> 13:23	300:3
217:1,4,4,4	283:24 285:15	<b>labeled</b> 79:14	113:12 125:6	<b>leaks</b> 31:22
219:1,11,11,12	285:17,17,18	186:25 188:25	225:1 250:3,4	32:18,22 33:14
219:15 220:2	285:22 286:1,3	192:5 195:23	287:1 298:11	36:9,12,18,19
220:18 221:7	286:8,25	<b>labs</b> 51:4	<b>leak</b> 33:16 35:7	36:20,24 38:11
221:16,22,23	287:12,13	<b>lack</b> 60:7 158:17	35:13,22 36:2	69:22 70:2,5,7
222:9 223:7,8	288:10,14,24	222:21 245:21	37:10,16 38:6	70:8,10,14,18
223:17,21	289:7,8 290:2	298:4,10	38:8 96:1	70:24 71:21
224:4,14 225:6	290:6 291:4,5	<b>ladder</b> 41:7	124:13 125:1	72:6,13,23,24
226:2,9,16	292:19 293:17	<b>ladders</b> 39:25	162:25 163:1,9	73:23 74:1,8
227:13 228:5,8	295:18 296:5,7	40:9,11	170:6,18,19,22	74:13,18 75:13
230:16,18	296:10,25	<b>lady</b> 44:22	180:22 204:24	77:6,22 78:4
231:11,21	298:17 301:10	<b>lady's</b> 178:9	213:19 214:4,9	78:22 84:19
237:6,7 239:7	302:5 304:16	231:18	214:12 215:2	88:7 89:8,25
240:13 241:13	304:23 305:2,5	<b>Lafarrera</b> 44:22	215:10 216:2,5	90:15 92:13,14
242:21 243:16	305:5,9	46:20 47:19	216:8,10,11	99:8,11 107:7
244:20,24	<b>knowledge</b>	128:20 206:7	241:1 244:13	107:16,18
246:24 248:6	77:21 78:2	<b>Lafarrera's</b> 47:1	254:18 256:2	108:9,23
249:10,22	94:3 138:19	<b>Lambert</b> 27:19	257:3,7,23	109:12,16



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732

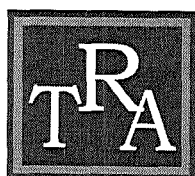
225.752.7308 FAX

New Orleans, LA  
504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

110:13 111:25	<b>leaving</b> 49:11	220:20	302:24 303:7	<b>log</b> 93:25 129:22
112:17,23	257:3,7,13	<b>letters</b> 61:25	303:13,17	131:13 132:1,5
113:10,25	300:3,4	<b>letting</b> 7:22	<b>list</b> 3:1 13:14	132:17,22
114:14 120:3	<b>LeBlanc</b> 27:24	<b>let's</b> 10:2 19:20	15:25 16:1	133:7,15 134:7
159:25 163:11	27:25	22:16 58:7	17:21 19:2	134:10,17,18
164:2,24 165:4	<b>left</b> 24:17 25:17	64:13 73:20	28:8 31:7	134:21 208:1,5
165:12,14,22	28:12 45:2,5	84:7 92:4	55:13 102:6	208:7,9,14,15
165:25 166:3,7	48:7 85:17	104:15 188:12	105:11 109:3	208:19 209:22
167:22 171:15	128:20 160:21	223:3,23	190:16,17	210:1 232:12
172:15 173:16	160:22 206:7	239:18 247:23	191:25 241:6	275:19 276:15
174:1,6,17	236:6	302:6	285:20	<b>logbook</b> 93:25
176:20 177:9	<b>leftover</b> 227:15	<b>level</b> 18:12 168:3	<b>listed</b> 86:11,19	97:6,9,16 98:9
178:15 179:18	227:21	305:3	109:21 117:12	201:21 254:4,4
192:12 195:15	<b>legal</b> 68:15	<b>levels</b> 43:4 48:5	127:13 142:9	254:6,11 255:9
199:24 200:3	172:17 186:21	<b>liar</b> 139:12	142:13 145:18	255:11 256:10
201:1,25 202:2	304:6,8	<b>life</b> 129:5	286:14	256:12 257:10
202:3 205:9	<b>LEL</b> 169:19	<b>light</b> 145:7	<b>litigation</b> 7:8	259:8,9,10
215:20,20,23	<b>length</b> 226:9	<b>limitation</b> 40:11	68:19	275:14,15,17
215:24 217:12	<b>Leo</b> 128:1 132:6	<b>limitations</b>	<b>little</b> 58:18 100:6	276:9,14
222:16 225:18	132:15 133:18	197:23	125:19 168:13	280:25,25
228:3,4 249:7	134:12,24	<b>limited</b> 41:5	211:25 286:23	<b>logbooks</b> 255:23
251:1 252:20	135:9,10,12	197:14,19	301:14	<b>logistical</b> 60:19
268:23 270:21	138:22 139:11	<b>limits</b> 14:23	<b>live</b> 5:15 20:1	87:24
271:6 272:13	139:24 140:4,6	<b>line</b> 86:5 112:9	<b>lived</b> 5:12 20:2,4	<b>logistical-type</b>
272:16,19	140:15,17,18	132:3 230:22	<b>lives</b> 48:20	60:8
293:24 294:18	140:24 141:8	230:22,23,25	<b>living</b> 41:17	<b>logistics</b> 225:10
295:13 296:25	209:9,25 210:3	244:21,21	<b>LLC</b> 1:18 2:4,7	<b>long</b> 5:12,23 6:1
297:8	210:6,10 217:5	<b>link</b> 52:2	<b>Lloyd</b> 28:3	6:2 7:2 12:17
<b>learned</b> 77:22,24	217:7 218:24	<b>linked</b> 57:5	<b>load</b> 29:13	12:18 21:5
77:25 266:21	219:10 244:22	249:11,12	<b>loaded</b> 29:25	22:1,24 23:18
<b>learning</b> 242:4,8	245:2 298:18	<b>liquid</b> 141:10	<b>loading</b> 29:16	24:2,22 27:4
242:15	298:18,25	144:9 147:23	214:2 245:6,7	28:22 46:10,22
<b>leave</b> 23:21 25:1	<b>Leo's</b> 132:20	149:2 156:10	<b>located</b> 36:8	47:11 48:6,8
25:7,8,9,10	<b>lethal</b> 146:22	156:15 271:2	164:6	55:13 85:1,3
47:12 48:13	<b>letter</b> 205:20,25	296:21 297:13	<b>location</b> 158:21	139:9 140:5,5
53:23 96:3	206:10 207:20	297:15,21,25	170:5	140:8,12 149:7
97:24,25 98:2	207:23 211:20	298:1,7,20,24	<b>locations</b> 36:8	149:7 158:15
98:7,25 132:2	211:21 212:11	299:13,13,19	124:12	164:8 197:9
256:6 262:23	212:12 213:1	299:21 300:1	<b>Lofton</b> 261:13	209:4 230:2,3
264:12	218:20,22	301:2,7,13,23	261:13 262:1	237:4,6 254:23
<b>leaves</b> 300:2	219:9,15 220:3	301:25 302:16	263:15	282:10



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

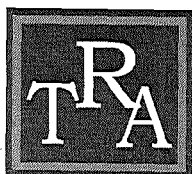
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>longer</b> 13:3 85:5	<b>looked</b> 14:12,13	135:25 158:23	102:6 104:10	<b>mark</b> 79:9,10,12
<b>Lonnie</b> 69:24	21:17 23:8	160:3,5 161:16	106:8,12,23	139:5,8 181:18
72:11 217:21	24:8,20 35:12	161:19 168:6	114:12 118:7	188:13,13
218:17 269:18	44:1 83:1	176:18 179:4	119:12 122:19	205:18 210:21
<b>look</b> 15:25 17:10	84:24 85:1	179:13 197:2	123:6 213:8	231:6 234:25
17:12 35:11	87:5 114:17	207:7 217:8	223:19 225:14	241:24 246:4
53:18 54:21	115:1,11,15	264:3 269:17	268:2,3 269:14	248:20,23
58:17 63:15	116:6,24	286:1,2,19	270:10 277:10	<b>marked</b> 16:7
78:13 85:7,11	161:21 168:8	<b>Lotus</b> 212:4	282:15,24,25	79:20 142:21
87:3,4,6 88:14	194:24 196:3,8	238:1	293:6	142:24 181:15
93:25 95:12,23	201:20 211:11	<b>Louisiana</b> 1:2,15	<b>major</b> 20:22	188:16,20
101:15 103:14	232:15 236:25	1:20 2:5,9 4:6	21:15	189:22 190:1
103:24 105:13	254:4 256:13	4:19 5:11,18	<b>making</b> 25:4	205:16 210:18
106:7,16 107:6	257:23	19:24,25 20:4	38:4 122:3	231:3 234:23
108:13 112:3	<b>looking</b> 25:3,6	22:15 23:4,9	123:5 129:10	235:10 241:21
114:18 123:20	35:12 53:14	62:13 63:2	291:1 293:8	241:24 246:1
127:4 131:17	83:23 117:17	254:23 306:4	<b>man</b> 81:5	248:1,3 249:2
132:10,19	119:25 120:9	306:21	<b>management</b>	<b>mask</b> 139:9,22
136:8 138:1,5	146:4,16 147:2	<b>lowest</b> 146:22	101:19 102:19	140:11
138:8 143:1	150:3 154:7	<b>lunch</b> 65:8	105:2,4,5,7,8	<b>material</b> 155:2
144:23 145:6	157:9 158:6,22	125:17 126:12	106:7 108:22	155:24 284:20
161:13 168:5	173:4 191:8	<b>lung</b> 155:1	115:17 116:10	296:24
169:11 170:22	196:1,13	<b>Lynell</b> 27:18	116:11,13	<b>materials</b> 43:22
175:11 183:4	199:14 240:16	<b>Lyons</b> 24:4	164:2	153:14,22
187:13 190:6	246:12,22	<b>L.J</b> 28:3	<b>manager</b> 24:10	<b>math</b> 58:18
192:15 193:9	248:15 253:16		26:9 28:16	<b>matrix</b> 213:11
195:21 197:10	<b>looks</b> 80:9 126:4	<b>M</b>	31:8 40:14,20	213:15
198:9,9,10	178:19 192:12	<b>M</b> 1:4 2:8 23:11	40:21 86:2,4	<b>Matt</b> 48:19
215:17 233:19	192:16 194:4	<b>Madere</b> 31:6	186:7 242:4,8	49:22,22,23
235:11 237:2	199:15,18	40:22 59:24	242:15 286:17	50:7 51:9,11
238:18 239:18	206:16 231:8	60:20	<b>manual</b> 15:19	52:6 56:9,11
239:19 246:10	246:14 248:8	<b>mail</b> 61:25	16:1 29:6	60:24 61:15
247:15 248:17	<b>lose</b> 205:13	<b>mailed</b> 26:2	213:10	62:22 63:9,19
251:20 252:7,9	251:12	<b>main</b> 128:23	<b>manuals</b> 90:9	64:3,4 65:24
253:1,4 257:18	<b>lot</b> 9:16 34:5	<b>maintained</b>	105:6 117:20	77:5,11,22,24
257:20,21	36:9,12,13	97:15 119:17	<b>manufactures</b>	77:25 78:4,22
258:3,11,16	39:22 41:16	<b>maintenance</b>	141:10	79:1 80:10
260:7 265:24	42:11 48:4	27:14 28:1,2	<b>March</b> 101:14	81:24 82:1,19
266:20 270:9	51:11 60:23	33:8 37:12,19	103:19 175:7	92:8 195:4,9
283:24 290:18	87:4 128:18	37:23 59:17	175:10 221:19	197:8 199:5
292:25 302:5,6	131:18 135:1	72:12 73:17	222:10 237:3,3	201:10 226:24
		74:22 76:22		



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

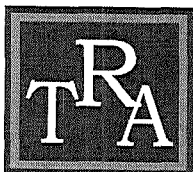
Baton Rouge, LA  
225.751.0732

225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

293:18 294:5 294:12 304:17 <b>matter</b> 127:6 307:1 <b>Matt's</b> 56:4 61:16 <b>maxed</b> 35:4 <b>maximum</b> 35:1 <b>Mayers</b> 28:3 <b>mean</b> 18:7 34:4 73:24 89:15 95:24 96:2 103:12 105:3 109:2 128:22 130:6 137:25 145:10 148:23 153:15 160:23 166:13 167:17 180:8 200:6 203:8 240:13 242:12 300:11 <b>meaning</b> 264:2 278:11 <b>means</b> 120:11 122:17 150:19 176:1 237:6,7 <b>meant</b> 67:23 262:18 <b>measurable</b> 173:21 <b>measured</b> 165:16 240:12 <b>measures</b> 156:25 <b>measuring</b> 169:18 <b>mechanic</b> 106:16 <b>mechanical</b> 104:12 105:9 106:15 111:17 122:16	<b>mechanical-in...</b> 121:2 <b>mechanics</b> 27:24 227:21 <b>mechanism</b> 75:18 <b>media</b> 158:15 <b>medical</b> 128:10 128:13 209:25 301:4,9 <b>medication</b> 8:14 <b>medicine</b> 8:18 8:22 <b>meet</b> 80:25 81:4 96:9 101:20 102:16 108:6 178:8 225:17 265:2,4 275:1 282:15 <b>meeting</b> 14:22 75:4,6 82:15 82:20 95:25 96:16 107:13 110:23 178:3 205:3 224:6,8 225:1,8,9,10 225:12,14,18 230:8 279:10 <b>meetings</b> 74:7 74:17,22 97:2 97:15 107:11 110:1,10 125:5 182:14 205:1 222:23 224:5 <b>meets</b> 230:5 <b>Melancon</b> 28:1 <b>melt</b> 171:6 <b>membrane</b> 155:13 <b>membranes</b> 144:10	<b>memory</b> 253:6 <b>men</b> 228:19 <b>mention</b> 13:8 292:23 <b>mentioned</b> 31:2 65:14 145:9 146:17 153:5,7 160:18 163:23 181:23 230:20 273:6 278:3 279:22 <b>mentioning</b> 113:20 <b>mentions</b> 112:20 <b>mess</b> 107:3 <b>met</b> 49:21 50:6 79:4,6 81:2 93:21 94:14 96:8,12,15,22 96:23 109:21 274:24 278:7 285:9 <b>Meta</b> 10:3 12:10 87:15,21 <b>metal</b> 114:13 292:11 <b>metals</b> 151:11 <b>Metco</b> 64:13 <b>meters</b> 51:13 <b>method</b> 159:3,5 233:20 306:11 <b>methodical</b> 35:21 <b>Micardis</b> 8:20 <b>Mid</b> 32:13 <b>middle</b> 1:2 26:4 <b>Mike</b> 31:6 <b>mile</b> 164:6 <b>miles</b> 157:16 <b>mill</b> 9:21 <b>Miller</b> 10:2,4	11:4 12:14,17 77:4 85:25 86:7 93:21 96:22 204:16 204:22 205:21 206:18 218:19 220:2 221:5 237:4,5,19 241:17 <b>milligrams</b> 146:23 <b>mind</b> 77:20 89:3 150:18 246:8 271:11,20,21 284:23 <b>mine</b> 34:5 <b>Mingo</b> 262:2,2 263:15,20 <b>minimize</b> 273:16 <b>mini-shutdowns</b> 287:4 <b>minor</b> 21:15 36:21 <b>minute</b> 92:20 140:16 168:8 <b>minutes</b> 140:15 <b>MIQA</b> 104:12 104:18 105:8 106:9 118:6,10 <b>mischaracterize</b> 72:17 <b>missed</b> 211:12 <b>misspoke</b> 127:14 <b>mist</b> 297:14,21 298:6,8,20 299:1 <b>mistaken</b> 218:1 218:3,4,9,10 249:11 260:3 <b>mitigation</b> 71:4 157:2,7	<b>mixes</b> 300:20 <b>mixing</b> 300:6,7 300:18 <b>MOCP</b> 102:5 105:7 <b>mode</b> 122:1 293:19 <b>modes</b> 122:2 <b>modify</b> 18:16 <b>module</b> 242:13 242:14,16,23 242:25 <b>moist</b> 153:13,21 <b>moisture</b> 151:12 151:15 154:19 300:20 <b>moment</b> 34:8 36:23 37:22 43:13 98:21 109:18 150:23 160:8 255:7 284:24 <b>momentary</b> 73:14 <b>Monconduit</b> 96:23 230:1 <b>Monday</b> 252:2 253:13 261:17 261:19,20 <b>money</b> 23:8 251:12 <b>Monhollen</b> 203:22 <b>Monique</b> 2:8 9:5 16:9,18 19:1 133:2 193:6 219:19 238:14 264:2 <b>monitor</b> 52:11 158:5,6,7 169:22 245:17
--	--	---	--	---



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

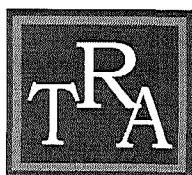
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>monitored</b> 52:13 54:23,24	144:23 145:9 145:20 146:1,8	27:23 80:5 180:13 227:18	<b>neighbor</b> 100:19	258:17,18
<b>monitoring</b> 174:24 175:1,5 175:10 220:9 220:11,15,19	146:12 147:5 147:12,24 148:13 150:3,7 153:17 177:18	264:23 286:2 <b>Natasha</b> 264:13 264:17,24	<b>neighbors</b> 177:4 177:9,10	260:21 262:7
<b>monitors</b> 157:21 169:18	177:19,23 180:24 262:3 263:17 296:20	<b>nature</b> 43:7 280:20	<b>NEMOURS</b> 1:7	<b>nights</b> 162:11,14 229:1
<b>monoxide</b> 169:20	297:13 301:6,7 301:22 302:2 302:23 303:24	<b>near</b> 156:6 256:25	<b>Nevada</b> 156:6	<b>nighttime</b> 90:18
<b>month</b> 24:8 28:12,14 49:8 61:6 63:14	<b>mucous</b> 144:10 155:13	<b>necessarily</b> 14:17 135:1	<b>never</b> 22:1 31:9 31:11 71:22 72:5,13 76:7 76:24 99:20 135:20 136:23 137:1 139:10 140:25 162:24 163:4,6 173:15 185:9 188:22 194:7,9 195:19 199:8 219:5 250:24 258:1 262:4 263:9,18 288:23	<b>nine</b> 82:7
<b>monthly</b> 49:1,7 53:3 55:7 66:5	<b>Murray</b> 207:17	<b>necessary</b> 33:25 36:7 37:13 122:17 123:8 152:8 209:7	<b>new</b> 1:20 2:9 18:4,17 24:3,3 67:6,6 73:21 119:23 164:7,9 283:6	<b>nodding</b> 8:5
<b>monthly/quar...</b> 62:16	<b>Mutual</b> 182:10	<b>need</b> 8:8,13 17:3 39:11 116:24 121:25 144:20 144:21 150:13 159:7 170:18 179:3 192:1 201:16,20 205:5 210:11 216:5 243:7 256:19 269:4 269:24 273:4 296:15	<b>newbee</b> 31:5	<b>nonresponsive</b> 200:19
<b>months</b> 12:5 24:6 25:16	<b>M-A-Y-E-R-S</b> 28:3	<b>needed</b> 37:22,24 39:1,3 42:4,8 48:21 74:25 89:21 123:9 174:1 186:4 206:17 220:15 243:18 259:24 267:1 268:3 294:6 295:9	<b>newspaper</b> 25:22	<b>non-event</b> 132:1
<b>morning</b> 5:6,7 11:7,8 38:2 127:11 162:22 163:5 224:8 225:1 254:22 259:16	<b>N</b> N 2:13 4:1 180:1	<b>needs</b> 60:10 277:11 292:24 295:20	<b>nice</b> 42:19 55:13	<b>normal</b> 151:10 177:15
<b>motor</b> 179:21	<b>nailing</b> 105:12	<b>negatively</b> 8:24 287:16	<b>night</b> 34:9 37:7 37:7,9,11 39:1 90:20,20,21,23 91:10,12 93:6 93:10,13,14,15 93:20 94:8,11 94:15,23 95:4 95:20 100:2,2 161:23 162:4,7 162:10 183:12 183:13 241:2 252:21 253:1 257:1,8,22	<b>normally</b> 33:17 146:16 179:2
<b>motorcycle</b> 12:9	<b>name</b> 5:8,10 10:5 11:22 23:11,25 24:5 24:12 26:13 27:25 29:15 41:20,24 43:17 43:25 80:11,12 81:6 86:5,6 119:22,24 132:20 143:13 178:9 180:2 190:18 191:8 191:19 206:24 212:8 231:18 261:5 264:10 264:14		<b>noticed</b> 168:7	<b>north</b> 83:19
<b>mountains</b> 157:13	<b>named</b> 32:8 44:22 48:19 80:10 262:2		<b>notification</b> 90:10 243:12	<b>Nos</b> 188:16 246:5
<b>mouth</b> 144:10 215:6 269:23	<b>names</b> 18:3		<b>notifications</b> 90:8 205:5 293:22,25 305:4	<b>note</b> 95:20 214:1
<b>mouthful</b> 154:3			<b>notified</b> 182:8 245:12	<b>noted</b> 97:9 232:11
<b>move</b> 23:3 35:21			<b>notify</b> 38:14	<b>Notes</b> 212:4 238:2
<b>moved</b> 19:25 22:15 23:5,8,9 24:6 25:3 178:10			<b>November</b> 1:22 100:10 253:24 254:14,15 274:8,25 281:13 282:1 283:15	<b>noticed</b> 168:7 90:10 243:12
<b>movement</b> 41:5			<b>nowadays</b> 42:18 59:2,7,19	<b>notification</b> 90:10 243:12
<b>MSDS</b> 142:8,15 143:1,2,5,11 143:15 144:20			<b>nuclear</b> 157:10	<b>notifications</b> 90:8 205:5 293:22,25 305:4



# **TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

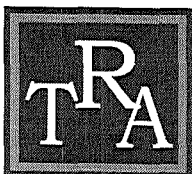
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>number</b> 35:11 35:12 86:19 130:22,23 172:17,18,20 172:22 173:11 179:8 187:12 202:17 203:3,9 236:7 241:12 247:14 248:18 <b>numbered</b> 1:13 14:18 53:6 <b>numbers</b> 17:24 53:7,11,14,18 54:10 55:10 85:15 86:15,16 86:18 87:14 117:11 148:17 158:16 160:19 174:21,25 175:1 205:19 234:2,5 239:9 240:11 271:4 300:10 <b>nurse</b> 209:18 210:5 <b>nuts</b> 46:6	288:17 289:20 298:4,10 <b>objections</b> 4:12 <b>obligation</b> 176:7 176:14 <b>observations</b> 80:19 <b>observe</b> 140:8 266:11 <b>observed</b> 63:10 140:13 <b>obtained</b> 138:19 <b>obtaining</b> 186:21 <b>obvious</b> 124:12 135:12 <b>obviously</b> 16:25 199:21 <b>occasion</b> 41:7 76:15 <b>occasions</b> 31:21 32:19 35:6 43:12 <b>occupational</b> 261:12 <b>occur</b> 279:9 <b>occurred</b> 96:14 129:24 134:9 164:25 165:5 165:12 252:21 <b>October</b> 71:17 71:20 122:12 125:22 126:4,7 126:13,19 127:5 221:25 224:10,23 227:7,10 251:16 252:2 252:21,22 254:19 257:1 257:17,21	258:24 259:12 259:18 260:1 260:19,22 265:11,17 266:18 274:18 281:14 282:1 283:7,10,14 285:2 <b>odd</b> 136:9 140:20 219:6,7 219:8,10 <b>offer</b> 23:7 41:22 47:17 282:4 <b>offered</b> 41:13 58:2 <b>office</b> 11:25 12:20,23 14:25 22:23 23:22 86:23,24 89:10 197:4 217:3 228:9 286:5,7 <b>officer</b> 306:5 <b>OFFICES</b> 1:17 <b>official</b> 40:2 44:21 45:10 47:19 48:11 85:24 86:12 91:14 98:10 276:2,5 278:19 280:22 286:3 <b>officially</b> 27:6 44:6 45:9 276:4 <b>officials</b> 279:10 <b>officiated</b> 4:20 <b>off-site</b> 230:21 255:13 256:5 256:17 <b>oh</b> 31:1 89:24 122:22 145:17 174:18 186:23	187:18 189:3 207:11 <b>Ohio</b> 48:20,23 <b>okay</b> 6:8,12,16 6:25 7:4,12,20 8:18 9:7,16 10:5,11,23 11:4,8,11,14 12:3,24 13:20 13:22 15:9,14 16:15 17:21,25 18:19,25 20:3 20:6,10,24 22:14 23:3 24:7 26:14 27:8 30:8,24 31:9,20 32:6 32:11 33:13,18 34:7,12 36:6 36:11,14,22 37:1,14 38:5 38:13,21 39:8 39:15,18,23 40:17,21 41:4 42:20 43:11,15 44:2 45:8 46:11,19 47:3 47:11,14 49:5 49:16,25 50:8 51:22 52:8 53:20 54:2,9 54:24 55:3 56:7,12,14 57:14 58:10,13 59:18 62:11 63:11,24 65:3 65:5 66:16 68:1,4,18,22 70:9 71:2,7,12 71:16,18,25 73:10 74:11	75:2,8,22 77:5 78:3 79:4,10 81:14 82:14 87:12 88:6 90:6,24 91:6 91:13,20 92:18 93:19 94:1,14 94:18,24 95:3 95:24 97:14 98:2,14,24 99:3,11,25 102:2 103:4,25 104:6,17 106:11,18 107:4 108:15 109:11 110:19 111:19 113:23 114:8 115:5,15 115:23 116:7,8 116:19 117:10 118:2 119:6 120:2,12,16,21 121:11,18,25 123:13 125:5 125:16 126:15 126:24 127:3 127:25 128:4 128:19 130:10 130:17 132:8 132:25 133:12 135:21 138:17 138:21 139:7 139:13 141:9 141:21 142:14 142:23 143:14 143:24 147:4 147:21,24 148:6,16,19 149:8,11 150:11,18 153:2,12,19,20
<b>O</b>				
<b>O</b> 4:1 <b>oath</b> 4:20 <b>object</b> 72:16 107:21 109:8 112:2 136:14 144:13 276:22 279:24 <b>objection</b> 73:3 110:3,16 113:1 113:14 145:7 145:12,15 149:18 272:2,7 277:3 278:24 281:19 284:13				



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732

225.752.7308 FAX

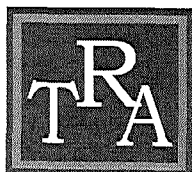
New Orleans, LA  
504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE



154:16 155:23	240:4,24 241:9	91:4 99:25	<b>operator</b> 25:25	150:10,16
156:18 157:21	241:12 242:7	115:23 117:4	27:25 28:18,20	<b>orientation</b>
158:8 159:9	242:20 243:17	117:11 165:15	28:22 29:3,10	181:3
162:1 163:17	244:4 245:4,10	165:16,17	30:8 31:10,12	<b>originally</b> 19:24
167:9,15,20	246:7,19	189:22 190:1,1	31:15,20 32:12	58:1
168:9,25	249:17 250:19	191:5,5,22	32:17 33:14,20	<b>Orleans</b> 1:20 2:9
169:24 170:10	255:22 256:23	210:23 236:25	35:1,4,8 38:6	24:4
170:23 171:8	257:5 259:4	237:12	39:23 59:12,16	<b>Ormet</b> 179:11
172:2,6,13	261:15,23	<b>one-hour</b> 240:12	76:25 97:8,17	<b>Ory</b> 29:15
174:16 176:10	262:7,9,24,25	<b>one-on-one</b>	98:9 161:3	<b>OSHA</b> 128:20
176:18,21	263:10 265:8	61:14,16	184:18 245:19	128:22,23
177:5,7 179:6	270:16 274:8	<b>ongoing</b> 72:23	256:8 276:6	129:2,4,15,19
179:10,22	278:18 280:19	178:15 294:21	<b>operators</b> 27:13	129:22 131:14
180:17,21	280:20 285:19	<b>on-line</b> 237:24	27:16 33:1	132:16 133:7,7
181:17 182:11	288:3,9 289:11	<b>on-site</b> 108:8	50:12,21 51:7	133:15 168:3
182:21 183:18	290:2,16 291:3	130:23 282:8	51:8 54:7 59:7	205:21 206:21
185:1 187:9,18	291:24 293:21	<b>on-the-job</b> 27:2	76:22 83:4	208:14,19
189:3,6,12	302:21 303:24	57:16	161:2 227:14	210:9 212:18
190:5,10,14	304:20 305:2	<b>opacity</b> 245:17	227:20 240:25	218:23 220:20
192:14 193:2	<b>old</b> 25:6 43:22	<b>open</b> 191:13	245:18 258:17	221:6
193:11 195:14	158:19 283:16	192:1	<b>operator's</b> 38:17	<b>OSHA-contact</b>
196:8 198:6	<b>older</b> 43:23	<b>opened</b> 114:21	170:9 254:10	129:3
199:5 200:13	211:11	<b>opening</b> 104:8	276:15	<b>outcome</b> 307:1
200:18,23	<b>oleum</b> 156:14,15	<b>operate</b> 35:2	<b>opinion</b> 144:14	<b>outfall</b> 51:18,19
201:11,25	303:13,14,18	41:3 289:13,15	<b>opinions</b> 306:22	52:10,16 53:5
203:1,6,14	303:20,21	291:15,18	<b>opportunity</b>	55:7 56:1
204:16 206:10	<b>onboard</b> 12:4	293:4	264:3	61:21 62:2,12
206:22 211:3	30:11 46:15	<b>operated</b> 38:7	<b>opposite</b> 138:6	64:16,17 65:1
211:16 212:21	<b>once</b> 32:20 49:19	<b>operating</b> 31:8	<b>option</b> 33:20	65:15 66:1
213:1,13,22	52:4 61:6	59:3 83:14	<b>order</b> 57:18	<b>outfalls</b> 53:6,8
214:19 215:15	159:15 177:3	105:6 106:10	87:16 124:9	53:16,17,20
218:1,16 220:8	200:10 204:11	114:9,10,11	170:17 187:12	54:2,16 65:17
221:1,3,12,17	232:6 242:6	116:13 117:8	236:4,7 241:12	195:13
221:21 222:1	263:6 266:5,9	117:21 289:13	244:8 251:1	<b>Outlook</b> 212:4
222:12,25	300:19	296:8	273:13 281:2	<b>outside</b> 61:9
223:3,11,25	<b>once-a-month</b>	<b>operation</b> 43:16	<b>orders</b> 87:16	108:12 202:1
226:19 228:17	230:8	45:16 109:5	<b>organ</b> 149:16	204:17,23
229:15 230:9	<b>ones</b> 9:13,23	286:23	<b>organized</b> 34:6	205:9,12
232:15 234:3	19:1,2 43:23	<b>operations</b> 41:25	<b>organized-type</b>	256:25
235:17 236:23	53:22 59:1,10	230:7 269:21	34:11	<b>overall</b> 105:4
238:20 239:4	70:15,25 88:20	287:1	<b>organs</b> 149:25	<b>overhear</b> 277:9



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

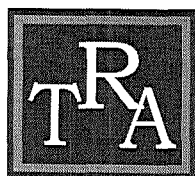
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>overheard</b> 277:6	74:8 75:10,13	190:14 191:11	60:13 61:25	32:11,22 38:7
<b>overtime</b> 31:19	225:11	194:10 236:25	64:9 75:19	38:8 51:14
229:16	<b>paragraph</b>	253:8 257:25	78:8 80:3 82:3	68:20 71:10,15
<b>overview</b> 242:18	213:3	260:24 266:7	82:4,7 100:22	71:19 72:14,24
<b>owned</b> 179:11	<b>parameter</b>	271:23 282:23	101:9 104:15	77:20 78:20
<b>oxidizing</b> 151:11	108:12	<b>particularly</b>	105:17,19	91:2 133:20
<b>oxygen</b> 169:19	<b>parents</b> 23:5	144:10 275:23	107:5 109:19	134:2 171:22
<b>Ozbun</b> 1:11 5:1	<b>Parish</b> 182:21	<b>particulars</b>	109:21 110:11	216:22
5:6,10 15:25	183:15 285:25	255:6	111:11 116:3	<b>periods</b> 131:12
127:25 134:21	<b>parking</b> 179:13	<b>parties</b> 4:4	121:2 136:23	<b>Perkins</b> 24:14
188:7 284:11	<b>part</b> 4:15 40:1	306:25	138:5 159:4	<b>permanent</b>
299:8 306:6	45:5 46:25	<b>partner</b> 31:16	163:17 170:7	155:5
<b>Ozbun's</b> 125:20	47:9,10 49:13	33:4	172:12 178:20	<b>permissible</b>
<b>O-R-Y</b> 29:18,19	50:14,22 61:1	<b>parts</b> 67:22 95:3	179:5,11 205:2	168:2
	78:1 85:17	<b>Paso</b> 103:8	205:8,13	<b>permit</b> 55:3,6,6
<b>P</b>	98:19 103:11	<b>pass</b> 12:8 214:14	206:16 215:23	63:11,20 64:1
<b>P</b> 1:13 4:1,18	104:1 115:20	<b>passed</b> 58:10,12	217:10 223:7	66:2 215:13
306:3 307:8	121:17 123:11	277:22	223:15,19	<b>permits</b> 46:15
<b>page</b> 2:14 79:23	129:20 141:19	<b>pasted</b> 198:13	225:9,10,11	49:15
83:24 213:2	142:14 154:10	<b>pasting</b> 198:12	241:15 243:1	<b>permitted</b> 51:20
234:16 236:18	157:7 170:8,9	<b>Pat</b> 28:2	243:25 253:18	52:10,16 54:3
239:22 240:15	178:4 183:14	<b>patched</b> 38:11	257:9 258:4,18	54:4 56:1,2
240:20 243:3	186:20 191:11	<b>pathway</b> 236:17	262:1,14 277:6	84:23
246:7 254:6	204:7 214:25	<b>Patterson</b> 10:2	278:7 280:13	<b>permitting</b>
255:15 257:11	215:12 217:20	11:1	283:19 285:19	46:14 63:6
275:13 276:15	230:19 233:3	<b>pay</b> 21:23	286:1,2,3	216:14 217:17
<b>pages</b> 79:11,11	266:10 271:13	<b>Payne</b> 20:17,19	288:6 292:1,14	<b>Perry's</b> 199:18
79:13 194:19	302:15 303:24	20:22 21:5	294:7 303:3	<b>person</b> 6:22,23
236:19 306:9	304:14	22:5	<b>percent</b> 156:14	6:23 7:22 12:2
<b>paid</b> 166:6	<b>participate</b> 42:8	<b>PCM</b> 102:12	156:15 303:14	44:23 69:9
229:16	74:7,16 237:20	<b>pedigree</b> 207:4,5	303:21,22	81:17 102:10
<b>pain</b> 8:22 39:16	<b>participated</b>	207:6	<b>percentage</b>	118:6 119:13
<b>Paine</b> 264:13,16	65:24 74:21	<b>peer</b> 27:12 28:9	300:13	128:20,22,23
<b>painter</b> 7:9	103:16 237:12	30:16 61:5	<b>Percy</b> 27:19	129:3 162:10
<b>paper</b> 99:22	<b>participation</b>	<b>PEL</b> 168:5,6,8	69:25	163:19 167:15
105:14 106:19	101:25	<b>PELs</b> 213:21	<b>performed</b>	180:23 182:11
111:4,9,22,24	<b>particular</b> 6:12	<b>people</b> 9:10,12	123:6 192:17	182:12 185:24
112:12,13,19	36:9 76:8	9:16 13:14	192:21	200:20,24
186:21	94:16 98:21	26:10 37:20	<b>perimeter</b>	201:3 206:17
<b>papers</b> 257:6	113:6 137:8	40:19 47:15	164:17	208:17 228:10
<b>paperwork</b>	147:1 182:12	56:18 59:21	<b>period</b> 30:23,24	229:24 234:9
13:23 41:19				



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

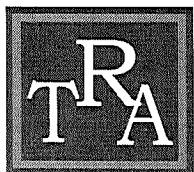
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

243:10,20	129:5 178:10	71:13 78:25	83:16,17,19	<b>played</b> 22:2,5,9
252:9 265:23	179:8 256:10	97:7,16 100:23	85:2 86:1,4	22:10
277:15,18	274:17	103:10 106:8	95:4 103:8,16	<b>please</b> 5:9
282:24 286:6,9	<b>phones</b> 38:24	116:16 121:17	112:7 123:8	<b>plenum</b> 107:8
286:12 288:24	86:17	125:11 134:2	128:2 135:22	222:18
301:12	<b>physical</b> 20:23	147:2 186:15	136:2 137:18	<b>plenums</b> 70:12
<b>personal</b> 146:12	21:15 197:4	190:6 221:24	137:24 141:20	108:24 113:12
151:17,23	<b>physically</b> 16:21	222:5 228:14	149:6 157:23	171:17 173:18
170:24 175:10	16:24 49:25	228:18 274:15	160:1 161:16	201:2 202:6
199:2 279:11	244:23,25	274:16 279:7	162:4,12,17,24	<b>pneumonitis</b>
282:16,19	<b>pH's</b> 51:23	300:8	162:25 163:5,9	155:19
298:17,21	<b>pick</b> 30:19 46:1	<b>PLAINTIFF</b>	166:16,22	<b>point</b> 22:2 26:3
306:12	124:14	1:12 2:3	167:3 177:13	30:3 35:14,17
<b>personally</b>	<b>picked</b> 275:24	<b>Plaintiffs</b> 125:21	179:12 182:8	36:4 37:16,17
122:21,22	<b>picking</b> 49:10,12	<b>Plainview</b> 20:7,8	182:12,19	40:20 41:23,25
136:24 262:16	<b>pictures</b> 262:12	<b>plan</b> 67:16	183:7,8,11	42:21 43:25
262:17	262:22 287:19	224:24 269:9	184:11,17	44:7,15,16,21
<b>personnel</b> 38:15	<b>piece</b> 40:8 46:2	285:2 295:5	185:7 186:1,7	46:22 51:16
105:8 243:5	76:8 99:22	296:7	202:23 203:15	69:8 83:9 95:1
<b>person's</b> 115:8	140:6,7,18	<b>planning</b> 279:4	205:12 218:25	103:13 128:4
<b>perspective</b>	142:6 157:7	287:1 295:16	225:13 227:11	138:18 161:7
229:10 250:7	270:10 302:20	<b>plans</b> 66:15	228:23 229:19	211:15 252:5
293:5	<b>pieces</b> 43:6	67:10 166:10	256:25 257:1	255:20 263:5
<b>pertain</b> 56:1	109:19 111:4	166:16,21	261:18 265:25	263:21 272:12
87:1 106:4	167:23 258:2	167:9 290:23	266:2 267:9	280:23 281:7
115:1 121:7	<b>Pierre</b> 27:19	291:1,2 295:11	268:10,13	286:9 300:7
302:23	<b>pig</b> 146:22	295:15	279:14 283:22	<b>pointed</b> 221:14
<b>pertained</b> 192:2	<b>Pilgrims</b> 22:17	<b>plant</b> 5:22 9:17	284:3,9,10	<b>points</b> 73:5
<b>pertaining</b> 52:22	<b>pinches</b> 133:23	26:7,9 28:16	286:10,13,17	246:23
92:15 111:4	<b>pipe</b> 41:16 118:8	31:8,22 32:18	289:10 290:20	<b>poison</b> 142:1,2
118:20,25	121:24 156:24	32:23 33:8,10	290:21,22	156:1
190:20	<b>pipng</b> 118:10	33:11,22 34:3	292:2 293:4	<b>poisonous</b>
<b>pertains</b> 54:5	122:3 271:15	35:2,12 37:1	294:7 297:9,14	141:24 155:24
111:23 112:13	<b>Pitman</b> 27:20	40:14,20,21	305:8	<b>police</b> 125:22
120:19 186:1	<b>Pittsburgh</b> 20:2	41:3,18 52:14	<b>plants</b> 42:17,22	126:7,18
305:7	<b>placard</b> 142:3	53:1,23,24	42:25 81:22	254:23 255:19
<b>ph</b> 296:4	156:2	54:15,25 61:6	82:2,9 183:13	256:11 267:15
<b>phone</b> 38:21,23	<b>placards</b> 142:2	64:5 67:22	<b>plant-wide</b>	267:18 285:21
78:8 82:20	<b>place</b> 29:8 46:15	69:22 70:3,6	77:21	285:25
86:15,19 92:21	51:2 55:2	73:11 78:5,19	<b>plastic</b> 202:17	<b>POLK</b> 1:18 2:7
92:24 93:2,5	62:17 67:14	81:8 83:1,14	266:13,17	<b>populations</b>



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

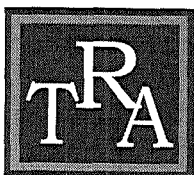
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

52:3	<b>PowerPoint</b>	<b>presented</b>	28:4 30:15	<b>procedures</b>
<b>Porrier</b> 28:2	242:4	174:19,22	35:4 40:8 44:3	67:13 106:10
<b>portal</b> 63:22	<b>POYDRAS</b> 1:19	<b>pressure</b> 34:23	46:12 49:18	114:6,8,9,10
243:6,8	2:8	37:18	61:6,13 69:2	114:11,25
<b>Porte</b> 61:9,11,12	<b>PPE</b> 129:9,10,15	<b>pretty</b> 21:14	70:21 73:6	115:10,16,18
<b>portion</b> 45:11	136:5,11,15,17	29:11 30:19	78:6,23 82:2,6	115:20 116:14
111:16 118:13	140:4 213:7,7	42:16 59:19	83:3 135:18	116:23 117:8
118:14 121:23	213:10,11	63:7 67:15	142:13 147:25	117:21 127:14
166:15 213:9	214:3,23 215:7	71:21 73:18	153:18 155:8	<b>process</b> 18:18
297:15,18	216:6 218:25	77:21 94:3	155:21 159:2	26:13 29:7
299:21 303:1	297:6 301:16	104:24 105:11	161:21 169:5	34:22 36:15
<b>portions</b> 293:20	303:3	142:7 143:9	178:4 181:3	39:13 40:25
<b>position</b> 6:21	<b>PPEs</b> 214:2	151:10 153:9	187:22 193:21	42:5 43:13
12:1 22:7	<b>PPLs</b> 145:18	153:10 157:19	195:12 197:8	46:5,17 56:6
29:16 41:20,22	<b>practice</b> 157:2	177:6 178:25	199:11 201:12	56:18 58:20
42:9 43:16	<b>Prairieville</b> 5:17	191:2 212:21	204:7,14	59:9,15 61:20
44:6 57:6 59:8	<b>Pre</b> 32:2	222:4 243:8	212:18 220:13	67:8 92:5
59:24 60:6,14	<b>precautions</b>	246:14 248:8	220:16 222:8,9	101:19 102:19
89:19 172:9	151:7	291:8 292:1	225:3 227:17	105:2,4 106:4
173:24 174:3	<b>Precisely</b> 268:19	299:15	232:4 241:10	106:5 108:21
180:7 287:9	<b>preemployment</b>	<b>prevent</b> 216:12	241:17,19	112:14 166:15
<b>possible</b> 34:15	59:4	<b>prevention</b>	267:13 288:8	166:15 183:19
36:25 125:4	<b>preparation</b>	66:15 100:16	294:15 299:18	217:17 243:22
148:11 194:18	214:25	<b>previous</b> 88:5	<b>problem</b> 33:12	248:3 260:2
<b>possibly</b> 67:19	<b>prepare</b> 9:3	<b>previously</b> 19:9	33:15 106:12	275:7 278:10
227:21	<b>prepared</b> 18:12	20:4 47:16	106:24 107:7	280:10 281:8
<b>post</b> 130:5,17	75:1 82:20,23	90:14 241:24	177:20 279:12	291:7
131:1 222:24	161:2 188:25	<b>primary</b> 164:5	294:21 296:4,5	<b>processes</b> 141:14
256:13	189:2 192:4	170:5 270:19	296:5	<b>processor</b>
<b>posted</b> 60:16	193:15,17,20	270:23,25	<b>problems</b> 106:15	190:15 192:25
129:25 131:15	214:19 231:14	<b>print</b> 193:12	115:12 123:4	<b>produce</b> 14:7
181:9	287:15 306:11	<b>prior</b> 171:24	145:22,22	17:4 29:9
<b>posting</b> 56:22	306:17	222:6 252:10	230:9 291:12	144:9 146:4
57:4,6 130:1	<b>preparing</b> 233:4	<b>privileged</b>	304:5	149:15,25
131:16 133:7	237:19 239:6	107:24	<b>procedural</b>	150:15
207:24	239:15 244:7	<b>privy</b> 60:3,22	266:3	<b>produced</b> 19:9
<b>potential</b> 70:24	285:3	<b>probably</b> 9:17	<b>procedure</b> 4:6	34:23 50:11
<b>pounds</b> 172:23	<b>presence</b> 159:6	9:19,22 10:4	90:10 115:4,14	78:10 79:12
172:25 240:8	169:25 170:1	12:21 17:14,20	115:22 116:2,6	99:8 106:1
<b>pouring</b> 218:11	<b>present</b> 2:10	22:18 23:6	116:9,21 118:1	126:12,20
218:13	45:14 157:3	24:24 26:3	306:21	132:23 143:19



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

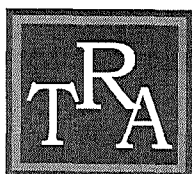
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

175:6 186:24 274:9 285:1 <b>producing</b> 125:21 <b>product</b> 68:21 85:9,13 87:17 303:23 <b>production</b> 16:25 29:9 33:7 38:19 104:9 141:14 141:17 188:5 229:13 <b>products</b> 43:3 87:18 <b>professional</b> 44:24 47:2 207:6 209:6 <b>program</b> 104:13 119:20 <b>progression</b> 27:9 <b>prohibition</b> 306:20 <b>project</b> 44:11 46:13,17 166:23 <b>projects</b> 67:14 <b>prolonged</b> 149:15,24 150:15,17,19 <b>prompt</b> 23:22 <b>prompted</b> 23:3 23:20 39:11 76:15 184:11 <b>proper</b> 233:20 234:3 244:15 284:14 <b>properly</b> 39:16 <b>property</b> 53:25 262:22 <b>proportional</b>	284:6 <b>protect</b> 67:13 123:1 299:1 <b>protected</b> 153:11 <b>protecting</b> 67:12 299:8 <b>protection</b> 151:17,23 164:23 165:4 165:12 <b>protocol</b> 19:9 127:15 <b>protocols</b> 105:5 <b>prove</b> 207:18 <b>proven</b> 151:4 <b>provide</b> 13:16 220:5 295:1,11 <b>provided</b> 268:22 <b>proximity</b> 213:18,24 214:1,4,8,8 <b>PSM</b> 101:7,10 101:18 102:4,7 102:13,14 103:2,2,5,18 104:24 111:8 207:7 <b>PSSRs</b> 105:7 <b>psychological</b> 58:17 <b>public</b> 22:20,22 130:7 185:17 185:20 277:22 278:2 279:10 280:22 286:10 <b>published</b> 146:22 <b>pull</b> 50:18 260:11 <b>pulled</b> 191:9	192:23 200:15 248:14 <b>pulmonary</b> 155:19 <b>pumped</b> 158:20 <b>pumps</b> 158:21 <b>punched</b> 67:17 <b>purpose</b> 228:2,5 <b>purposes</b> 4:7 173:13 243:5 <b>pursue</b> 262:25 <b>push</b> 33:20,23 33:25 <b>pushed</b> 34:8 <b>pushing</b> 34:3 <b>put</b> 16:12 32:13 50:14 51:8 54:6,17 56:15 81:6 85:24 86:6,7 93:24 97:8,18 114:24 125:20 130:7,8 130:15,21,23 130:25 131:18 132:1,3,15 133:21,25 134:6 158:19 184:6 195:1 197:23 198:15 199:1 209:21 212:13,18 215:7,12 232:11 233:5 233:21 255:24 269:22 289:7 294:17 <b>puts</b> 86:4 <b>putting</b> 244:7,10 <b>P.E</b> 21:11 <b>P.M</b> 305:13	<b>quality</b> 62:14 63:3 104:13 <b>quantification</b> 144:15 265:11 <b>quantify</b> 159:19 <b>quantities</b> 87:17 145:8,11,12 176:12 200:16 239:24,25 240:20 <b>quantity</b> 165:9 171:20 172:14 172:16,18 173:8,21 175:16,22 176:5,9,14 200:10 202:10 239:23 244:19 300:14 <b>quarter</b> 238:15 <b>quarterly</b> 49:9 49:10 53:3 55:8 66:5 <b>question</b> 4:13 7:23 8:11,12 14:12 65:2 70:15 72:20 78:1 92:11 100:21 107:1 110:5,23 124:18 133:5 135:9 139:5,8 144:22 145:25 149:21 150:6 165:21 167:24 173:23 176:25 177:2 197:18 211:8 214:3 215:16 216:3 218:7 228:1 229:3 234:1,14	235:8,22 268:20 270:3 284:14,17 291:17 <b>questioned</b> 212:20 <b>questions</b> 7:14 8:7,16 25:12 30:16 43:14 80:19 82:22 104:11 115:20 141:10 262:20 296:14,21 297:5 <b>quick</b> 35:20,20 196:13 <b>quote</b> 255:14 256:3,4 <b>quoted</b> 153:19
<b>Q</b>				
<b>R</b>				
<b>railcar</b> 29:15 <b>railcars</b> 29:13 29:25 30:1 245:7 <b>railroad</b> 60:10 <b>rain</b> 66:13 <b>rainwater</b> 66:14 <b>Ralph</b> 27:18 <b>ran</b> 262:11 <b>range</b> 44:20 70:22 <b>rapidly</b> 154:19 <b>rare</b> 241:16 <b>rarely</b> 106:6 <b>rate</b> 32:23 34:17 35:1,9,13,16 284:3,9 <b>rates</b> 33:6 34:17 35:8,23 37:10 283:22,25 284:1				



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

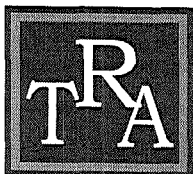
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>raw</b> 85:13 87:17	100:17 112:12	<b>recordable</b>	304:10	<b>RELATOR</b> 1:5
<b>RCRA</b> 61:12	137:8 138:21	130:25 132:4,9	<b>refinery</b> 164:14	<b>relay</b> 278:19
<b>reach</b> 111:21	139:16 157:16	132:16	<b>reflect</b> 121:15,16	<b>release</b> 51:20
235:15	177:5,6 190:21	<b>recording</b>	167:10 203:9	52:12 160:24
<b>reached</b> 115:7	194:9 210:15	257:22	<b>reflected</b> 207:24	175:16 178:25
<b>react</b> 153:25	253:12 256:22	<b>recordings</b>	<b>reflecting</b> 95:25	240:12 297:10
<b>read</b> 69:13 80:4	257:25 258:21	260:16 282:5	<b>reflects</b> 274:10	<b>released</b> 160:12
173:3,5 191:10	260:24 266:7	<b>records</b> 85:8	<b>refresh</b> 253:6	299:20
196:24 197:2	282:23 287:7	86:25 87:1,8	<b>regard</b> 62:12	<b>releases</b> 52:11
201:23 255:9	287:23	87:11,12 95:16	65:25 88:7	84:23 270:18
274:22 276:17	<b>reasonable</b>	95:19 101:15	134:12 167:24	<b>relevance</b> 17:1
276:18 284:20	17:13	103:14 114:7	290:24 293:23	112:15
304:6,8,11,15	<b>recall</b> 7:7 27:10	114:16 115:1	<b>regarding</b> 63:20	<b>relevant</b> 120:3,7
<b>reading</b> 4:8	30:23 33:13	115:11 118:11	89:12 98:10	121:18 135:3,7
154:8	34:18 36:17	118:25 121:3,5	125:7 304:6	176:25 177:2
<b>ready</b> 13:15	37:6 38:13	121:7,9,10,14	<b>regional</b> 206:19	202:22 203:1
169:8 211:22	40:2 57:4	121:15,16	207:1,13	288:13,20
223:10,12,12	78:21 103:15	127:4 181:10	<b>Register</b> 304:11	<b>relied</b> 294:3
227:24 292:23	126:11 128:10	210:3	304:11,15,18	<b>relief</b> 31:17
292:25	132:21 156:20	<b>red</b> 132:3 201:21	<b>regular</b> 8:19	<b>rely</b> 277:23
<b>reaffirmed</b>	179:17 182:25	<b>reduce</b> 33:7	129:18 230:6	292:3
248:10	188:19 245:4	<b>reduction</b> 34:19	265:24	<b>relying</b> 291:24
<b>real</b> 35:20	245:14,15	<b>red-line</b> 132:2	<b>regularly-sche...</b>	293:3
<b>realize</b> 125:13	256:1 277:14	<b>refer</b> 144:20,21	222:2,6 250:25	<b>remarks</b> 146:18
126:17	<b>receive</b> 147:6,8	<b>reference</b> 117:11	251:7	146:21
<b>realized</b> 128:11	<b>recertified</b> 63:7	<b>references</b> 196:5	<b>regulated</b> 240:7	<b>remember</b> 7:11
<b>really</b> 7:15 21:23	63:12	249:13 270:16	<b>regulations</b>	11:16 24:2,12
21:24 35:11,19	<b>recess</b> 65:9	<b>referred</b> 16:6	240:8	24:16 25:23
41:20 46:3	125:17 234:21	79:19 142:20	<b>regulators</b> 95:17	26:8,13 30:6
47:9,22 48:3	<b>recognize</b> 18:3	181:14 188:15	<b>regulatory</b> 42:10	34:9,10 35:2
48:17 49:18,20	180:22	205:15 210:17	46:16 75:20	36:9,24 49:20
58:15 66:2	<b>recollect</b> 134:16	231:2 234:22	78:8 80:3 89:7	58:10,13 69:18
99:9 103:23	<b>recommendati...</b>	241:20 245:25	108:7 112:5	77:2 79:7
138:4 139:4	230:6	247:25 249:1	<b>related</b> 74:8	100:17 114:22
140:21 147:2	<b>recommended</b>	304:9	209:2 306:24	131:20 140:20
169:8 175:20	151:18,23	<b>referring</b> 79:22	<b>relation</b> 288:10	178:9 183:16
203:5 210:2	<b>record</b> 5:9 14:6	96:18 100:9	<b>relationship</b>	184:22 191:1
230:12 241:5	19:7 67:24	126:6 240:2,5	87:2	221:9,11 222:8
250:5 269:4	96:20 107:2	240:15 253:11	<b>relationships</b>	254:5 256:7
270:8 283:18	125:21 126:2	253:21 260:17	306:20	281:16
<b>reason</b> 6:12 70:4	146:7 256:23	<b>refers</b> 244:1	<b>relatively</b> 164:9	<b>remotely</b> 50:9



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

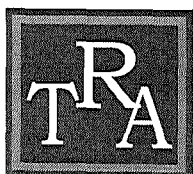
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

52:7,9,11 54:13 <b>reoccurred</b> 73:6 <b>repair</b> 72:4,5,7 123:4,9 224:2 225:24 269:2 288:1 291:11 293:11 <b>repaired</b> 38:11 71:22 269:2,3 282:21 289:9 <b>repairing</b> 122:7 122:10 225:18 <b>repairs</b> 70:8 71:23 72:3 168:10 222:13 226:7 250:2,6 250:17 266:25 269:16 291:21 293:8 <b>repeated</b> 149:14 149:24 150:14 <b>replace</b> 46:19,21 296:8 <b>replaced</b> 39:7,17 41:1 46:21 121:25 <b>replacement</b> 39:12 <b>replacing</b> 291:5 295:19 <b>replying</b> 294:1 <b>report</b> 49:8 52:4 63:7,23 64:3,4 64:15 67:3,8 75:25 76:4,5 80:1 83:4,23 83:24 88:2,6 89:6,25 91:9 91:15,22,25 92:5 95:21,22	107:12 110:9 111:2,5,18 125:22 126:7 126:18 132:16 139:21 161:3 161:10 171:20 172:5,14 174:12 175:20 176:1,2,7,15 181:22 182:1 183:17 184:25 185:5,9,15,17 185:20,25 186:10 199:23 200:3,6,25 201:24 208:24 209:12 210:9 232:7,22,24,25 233:4,10,16 234:10 235:6 236:3,11 239:1 239:16 244:2,2 244:13,15 246:22 249:15 259:11,21,23 260:1 261:21 263:4,7 270:17 270:18 279:22 285:4,11 289:12 293:18 295:8 <b>reportable</b> 130:24 132:9 165:9,15 171:20 172:16 172:18 173:8 175:16,22 176:1 200:9,16 239:23,24,25 240:20 244:19 <b>reported</b> 1:12,17	89:16 90:3,4 90:14 93:6 151:6 165:15 165:16 171:17 172:4 173:18 174:1,8 182:18 201:25 202:2 249:19 306:10 <b>reporter</b> 1:14 4:19 5:3 8:1,6 284:21 306:4 307:9 <b>REPORTER'S</b> 306:1 <b>reporting</b> 61:20 61:21 66:8 75:18 90:7,18 93:7 115:1,12 118:4 129:19 164:1 183:19 248:5 281:25 293:22 306:11 <b>reports</b> 48:25 49:1,3,5,6,9,14 50:10,15,18 51:10,11 52:1 52:1,6,25 53:3 53:9 54:18 55:8,12,21 56:1 61:7,17 61:23 62:5,7 62:11,16,25 63:18,19,24 64:6,8 65:12 65:15,25 66:12 66:24 67:2,10 75:15,16,17,21 77:4 82:11,13 89:11 90:20,22 92:3,9,12 160:21,25	161:2,17 176:23 209:25 231:13 235:12 235:25 236:15 239:4,5 290:17 290:18,18 294:17 305:4 <b>represent</b> 69:20 <b>representative</b> 86:9 182:13 227:19 <b>representing</b> 67:25 <b>reputable</b> 184:7 184:13 <b>request</b> 9:4 37:24 101:23 134:23 143:18 143:24 144:1 185:11 190:4 193:19 194:15 239:21 260:16 <b>requested</b> 13:17 113:6 127:13 174:10 189:13 190:23 191:7 194:5 198:11 221:10 260:13 284:20 <b>require</b> 301:9 <b>required</b> 49:1 52:24 53:25 213:7 293:22 293:23 306:18 <b>requires</b> 244:7 244:10 <b>reserved</b> 4:14 <b>respect</b> 120:4 127:12 168:3 175:3 <b>respirator</b>	135:17,18,19 135:25 151:20 152:1,14,16,19 152:23 153:5 214:6 298:22 298:23 303:2 <b>respirators</b> 152:7 <b>respiratory</b> 144:11 155:12 <b>respond</b> 32:17 <b>response</b> 8:4 90:9 105:11 179:1 183:14 210:20 <b>responses</b> 301:21 <b>responsibilities</b> 29:11,17 38:3 44:8 50:12 81:22 129:2 175:15,18,20 194:17 243:19 <b>responsibility</b> 29:21 73:20,23 73:24 81:25 82:1,8 128:23 <b>responsible</b> 85:24 86:11 <b>responsiveness</b> 4:13 <b>rest</b> 18:3 <b>Restate</b> 72:20 <b>restricted</b> 39:21 <b>restrictions</b> 40:3 <b>result</b> 44:12 139:21,23 155:17 166:7 255:3 256:21 274:16 <b>results</b> 119:14
---	---	---	--	--



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

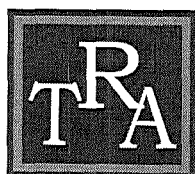
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

175:6	73:19 74:10	221:22 222:3,7	56:16 57:9	233:6 290:22
<b>retail</b> 24:11	76:9 78:17	229:1 232:25	68:24 89:23	291:22
<b>retirement</b> 6:3	80:4,5 84:5	237:11 239:23	128:5,8,19	<b>running</b> 35:9
41:13,15	86:9 89:10	243:11,13,18	228:15,25	40:6 203:15
<b>retract</b> 99:12	90:16,17 92:20	243:24 244:6,8	230:10 238:10	223:23 290:20
<b>retrieved</b> 260:14	94:12 95:1,14	246:12 253:8	240:25	290:21
<b>return-water</b>	95:19 96:10	256:3,4 257:8	<b>roles</b> 47:25	<b>R.S</b> 306:8
51:17	98:11,16	259:18 260:2	<b>Ron</b> 44:10	
<b>reverse</b> 204:20	103:20 107:19	265:15 266:12	<b>Ronald</b> 27:18	<b>S</b>
<b>review</b> 13:22	108:1,25 109:6	266:12 267:4	<b>Ronnie</b> 10:1,11	s 4:1 171:19
14:14 17:1	109:13 112:24	267:11,17	<b>room</b> 11:3,6,15	229:7
115:19	113:12,25	268:18 269:18	51:13 83:3	<b>SAF</b> 213:2,4,9
<b>reviewed</b> 14:24	116:25 117:23	269:21 271:17	85:17 90:5	213:12 215:16
18:21 210:23	117:24 122:6	271:19 272:5	91:12 92:22	215:17,21,25
<b>revised</b> 18:21	122:14 123:15	272:17 273:6	94:5 170:11,13	220:6
<b>revision</b> 18:20	123:19,25	274:11,24	170:14,15,20	<b>safe</b> 164:1 227:4
18:23	124:11 125:3	276:15 278:7	170:22 217:16	227:5 289:13
<b>RE-EXAMIN...</b>	126:9 128:5	278:22 280:11	254:3,11	289:13,15
2:20 299:7	129:18 138:3	283:23 284:11	257:21 276:16	290:19,22
<b>rhythm</b> 43:20	141:14 143:10	285:9 288:15	286:22 287:8	291:15,18,22
<b>RICHESON</b>	146:1,11	290:4,5,7	299:17,20	293:4
1:18 2:7	147:12,14	291:6,15,19	<b>Rosco</b> 26:9	<b>safety</b> 6:22 12:2
<b>ridiculous</b>	151:3 154:23	293:4,21 299:9	28:17	15:18 44:17,23
218:24 219:1	157:3 163:2	299:19,20	<b>Rouge</b> 2:5 16:20	44:25 45:5,11
<b>riding</b> 140:11	164:17 166:8	300:5,16,19,19	19:24 23:5,9	45:12,15,23
<b>right</b> 5:15 7:17	167:1,11	301:8,20	23:10,23 24:10	47:3,6,10,18
13:13 14:20	169:25 173:10	302:17,25	206:21	57:9 68:25
15:2,4 18:6	173:12,19	303:5,10,19	<b>ROUSSEL</b> 1:14	82:5 101:19
19:20 20:13	175:7,8 181:24	304:3	4:18 306:3	102:19 105:2,4
23:20,25 25:19	182:23 186:8	<b>rights</b> 197:12,14	307:8	105:6 106:4
26:6 30:22	187:16 188:5	197:19 290:23	<b>routine</b> 213:7	108:21 112:14
32:16 34:13	189:14 192:4	<b>ring</b> 245:5	<b>RPR</b> 307:8	117:20 121:7
40:2 41:10	192:17 193:18	<b>river</b> 51:17	<b>RQ</b> 172:18	121:12,19
44:16 48:6	194:24 195:23	52:16 53:21	<b>rules</b> 214:25	127:13 128:7
49:9 51:25	196:21 200:7	182:17	228:18 242:19	128:19 142:14
53:1 54:11,12	200:11 202:1	<b>Road</b> 24:14	306:18,22	143:12 163:18
55:3,20 59:11	203:4 204:21	182:17	<b>rumor</b> 9:21	172:10 186:1,9
60:18 61:16	205:7 206:6	<b>Robbie</b> 69:25	<b>run</b> 51:23	202:22 203:2
62:23 63:16,18	212:2 214:20	<b>rods</b> 289:8	123:11 194:3	206:6 207:1,6
68:2,9,11 69:4	214:23 215:9	<b>role</b> 27:4,14,16	194:18 232:22	213:9 226:3
71:10,12,22	217:3,6 221:14	32:1 48:8	232:23,24	228:10,15,18
				229:10,21



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

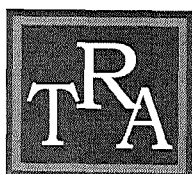
Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



232:5 248:3,4 252:8 265:22 268:21 284:7 288:12,23 289:11 <b>safety-OSHA</b> 137:6 <b>salary</b> 229:15,17 <b>sales</b> 251:12 <b>samples</b> 50:21 50:23 51:5,23 51:24 <b>sampling</b> 64:20 <b>sand</b> 7:9 <b>sandblasting</b> 7:10 <b>sat</b> 7:15 9:5 74:22 270:2 <b>Saturday</b> 16:19 <b>save</b> 4:12 <b>Savoy</b> 27:20 58:7 <b>saw</b> 37:9 68:23 136:5,10,17 140:6,14,14,23 140:24 157:13 157:13 159:10 184:25 189:18 190:8,22 194:9 206:2 207:20 211:1,8,17,19 211:20 236:24 249:17 257:6 259:6,7,9,16 <b>saying</b> 47:23 65:23 73:8 87:23 91:22 109:11 116:20 133:17 134:7 138:24 143:6 147:9,11	157:14 163:14 186:17 235:9 251:14 258:20 258:20 269:13 272:20 273:12 300:15 <b>says</b> 21:18 99:1 104:21 145:21 147:5 150:7 153:19,23 182:1,3,20 192:13 211:7 213:1,2 229:6 234:11 236:22 240:11 248:10 257:12,14 258:15 275:15 275:17 276:9 298:19 301:7 <b>say-so</b> 217:9,13 <b>scaffolding</b> 39:24,25 <b>scaffoldings</b> 227:23 <b>scan</b> 196:13 <b>scenarios</b> 58:20 <b>schedule</b> 183:4 265:24 <b>scheduling</b> 179:22 <b>SCHELL</b> 1:18 2:7 <b>school</b> 20:6,7,8 20:11,13,14 158:19 164:5,5 164:7,9,11,15 245:21 <b>schools</b> 20:7 <b>science</b> 21:14,18 172:21 <b>scope</b> 287:15	<b>Scott</b> 128:1 132:6,15 133:18 134:25 135:10,10 138:22 139:24 140:4 209:9 217:5,7 218:25 219:10 244:22 292:15,16,18 292:20,23 298:18,18 <b>Scott's</b> 134:12 209:25 210:3 <b>scratch</b> 118:9 <b>screen</b> 83:8,9 193:12 <b>scrubbing</b> 273:21 <b>sealing</b> 4:10 <b>search</b> 105:22 107:15,23 108:5 112:8 <b>seat</b> 140:11 <b>second</b> 31:2 78:1 235:3 <b>secondary</b> 270:19 <b>section</b> 144:24 150:2 153:18 154:10 232:19 232:21 <b>sections</b> 16:3 <b>security</b> 6:23 44:11,14 179:23 180:3 258:2 <b>see</b> 10:3 21:24 22:16 31:5 35:25 36:1,5 57:18 58:7 64:13 68:20	69:6 76:5 86:8 87:6 95:12 104:15 109:4 123:24 126:21 140:4,19 145:8 146:25 147:3 156:11 157:4 159:8 160:21 161:6,9,21,22 161:23 162:2 163:19 169:11 170:17 175:15 179:7 191:14 194:19 196:10 196:13 200:9 200:14 201:21 204:24 211:4 211:11 215:8 215:11 228:7 229:9 235:17 235:24 236:7,9 236:16 237:11 238:18 248:15 252:13 257:23 259:7 268:7,18 268:24 269:20 271:1,3,8 276:10 288:1,2 295:10 <b>seeing</b> 16:19 70:16,21 126:18 129:12 135:16 139:22 159:14 160:1 <b>seen</b> 28:6 68:9 68:12 75:14 87:7 88:5 119:16 135:20 139:10 140:7 140:18,25 161:1,10,17	162:25 163:4,6 163:8,10,15,16 166:10,18,18 176:22 181:20 185:5 187:20 188:19,22,24 194:11 202:9 204:21 205:25 207:23 212:22 219:5 231:10 233:15 242:1 257:16 259:11 259:25 285:7,7 287:14 294:14 298:21 304:25 305:1 <b>segregated</b> 14:15 <b>SELINA</b> 1:13 4:18 306:3 307:8 <b>sell</b> 68:21 159:4 <b>send</b> 199:3 221:6 295:5 <b>sending</b> 261:12 <b>sends</b> 68:16 <b>sense</b> 288:7 <b>sensitive</b> 151:15 <b>sent</b> 13:18 16:18 50:24 51:5 88:14 89:12,13 90:22 107:12 180:24 187:22 188:9 189:10 189:24 194:25 196:2 206:20 209:20,22 220:20 262:3 263:17 <b>sentence</b> 278:10 280:10 281:23
---	---	--	--	--



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

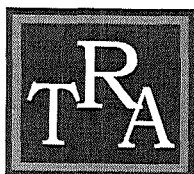
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>separate</b> 109:19	152:21	123:15,18,22	170:5 224:4	<b>six</b> 79:11
<b>September</b>	<b>shields</b> 152:7	123:23 124:1,3	261:19 268:8	<b>size</b> 259:1 288:4
71:17 78:16	<b>shift</b> 31:16 37:7	124:6,9,21	274:6 281:4,6	288:7,14 290:2
79:5 84:7	131:20,22	125:6 129:8,13	301:6	<b>skin</b> 144:5 145:1
100:5 122:12	<b>shook</b> 8:25	160:10 162:15	<b>site</b> 15:7 17:19	145:22 147:6,7
123:15 216:20	<b>shoot</b> 78:12	222:5,9,10,13	29:9 33:9	147:10,16,19
221:25 248:22	<b>Shop</b> 24:13 25:8	223:4,5 250:3	48:25 49:17	148:2 154:23
272:15,24	<b>shops</b> 106:10	250:25,25	50:4 53:24	215:6 297:16
274:14	<b>shortcuts</b> 25:12	251:7 252:11	55:1 67:17,18	297:17 301:18
<b>September/Oc...</b>	<b>shortness</b> 155:14	268:25 269:1	67:19,21 80:1	302:18
71:14 125:6	<b>show</b> 15:18,21	272:4,15	81:19 89:12	<b>skull</b> 142:2,3
<b>sequentially</b>	32:8 83:8	273:10,13	94:6,17 96:18	156:3
14:17	101:7 115:21	275:7 287:1	97:21 99:4,14	<b>slightly</b> 248:19
<b>session</b> 104:8	115:23 117:14	<b>shutdowns</b> 34:4	99:14 100:14	<b>slow</b> 34:20
156:5 303:14	142:23 181:17	72:3 73:9	106:5,22	<b>slowed</b> 34:22
<b>set</b> 51:1 73:21	183:25 205:18	122:19 123:21	107:13 111:8	35:13
166:21,24	231:5 234:15	250:2 251:2,3	118:16 120:3	<b>slowing</b> 33:7
167:2 196:24	241:23 246:3	269:25 273:7	120:22 121:19	<b>smaller</b> 35:23
306:8	282:4 287:24	274:4	128:21 134:14	36:3 42:7
<b>sets</b> 52:5	<b>showed</b> 32:14	<b>side</b> 138:11	136:12 137:5	163:10 247:11
<b>setting</b> 71:12	80:1,24 90:21	158:16	137:12 139:17	<b>Smith</b> 10:3
291:8	93:10 94:9	<b>significance</b>	139:25 141:11	12:10
<b>seven</b> 27:22,23	101:10 108:18	284:5	157:22 161:4	<b>smoke</b> 245:21
133:25 134:5,6	108:19 114:23	<b>significant</b> 257:2	169:16,17	280:15
134:10	116:5 117:4	<b>signing</b> 4:8	176:20,23	<b>smooth</b> 48:3
<b>seven-day</b>	118:2 181:4	<b>Simoneaux</b> 1:4	177:3 201:23	<b>smushed</b> 76:17
133:22 134:1	274:22 287:19	2:11 30:4	208:18 215:2	<b>sold</b> 22:18 23:16
<b>severity</b> 298:2,6	<b>shown</b> 100:3	256:24	226:9 227:22	<b>somebody</b> 18:15
<b>Shakes</b> 8:24	161:1 212:8	<b>Simoneaux's</b>	231:16 239:16	32:22 37:2
287:16	235:9 240:22	125:23 230:3	256:6 257:3,8	56:19 58:23
<b>shape</b> 82:9	<b>shows</b> 81:12	<b>simply</b> 43:7	257:13 262:18	74:3,15 79:5
<b>shared</b> 161:5	85:8 94:3	64:21 143:8	282:11 292:12	91:10 94:3
<b>sheet</b> 97:25	98:22 183:24	<b>Simpson</b> 104:18	<b>sites</b> 41:18 42:7	97:6,20 98:12
142:15 144:20	237:19	104:19 118:13	43:2 82:4	98:17,22
153:18 296:20	<b>shut</b> 23:22 33:11	118:15	<b>site's</b> 209:21	109:25 110:9
<b>sheets</b> 143:12	33:22 123:8	<b>single</b> 110:23	<b>sitting</b> 75:3	116:1,12
187:25 234:1	125:7 205:13	179:20	89:21 90:11	122:20 124:15
<b>sheriff's</b> 286:5,6	267:18	<b>single-absorpt...</b>	116:21 131:5	133:23 134:8,8
<b>shield</b> 140:5,23	<b>shutdown</b> 34:11	36:15	140:10 188:6	136:22 157:15
140:25 151:19	71:15,20 72:25	<b>sink</b> 157:1	<b>situation</b> 121:13	163:23 171:24
151:25 152:19	74:23 122:11	<b>sit</b> 62:9 70:5	138:7	182:17 183:16



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

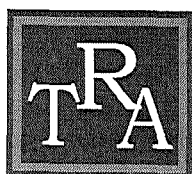
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

184:16 186:6 209:24 221:13 228:14 229:8 229:13 233:4 233:21 234:8 235:4 241:5 243:17 244:13 255:16 259:22 259:23 260:10 262:14 263:5 264:17 268:18 279:11 286:12 294:1 <b>soon</b> 6:4 20:5 <b>sore</b> 155:13 <b>Sorrento</b> 164:5 <b>sorry</b> 20:18 33:24 55:24 79:18 86:3 94:21 98:6 125:14 147:7 152:22 189:3 214:16 239:19 245:7 247:18 256:10 <b>sort</b> 8:5 9:14 12:15 32:9 34:6 35:18 40:12 42:12,15 43:2 44:6,18 47:6 48:7 57:15 62:1 63:10 67:2 82:4 88:20 95:7 105:17 109:18 148:7 148:13 152:3 166:20,20 177:16 184:5 204:13 206:25 224:12 225:12	226:14 236:17 269:6 286:6 293:14 301:4 <b>sought</b> 4:16 128:10 194:9 <b>sounded</b> 42:1 <b>sounds</b> 127:19 175:7 211:24 224:23 267:5 269:17 <b>source</b> 64:23 67:6 87:25 279:15,20 280:5 281:7 283:1,3 <b>sources</b> 268:23 <b>south</b> 83:20,21 <b>so-and-so</b> 279:6 <b>SO2</b> 53:18 143:21 163:2 169:19,22 208:18 217:22 218:8 300:24 301:1 <b>SO2/SO3</b> 128:1 <b>SO3</b> 35:25 36:1 36:4 84:19 136:12,19 138:14,19,23 139:4,17,25 141:3,10 142:9 142:16 143:15 147:5,15 150:14,15 156:10 157:4 157:21 159:6 159:20,25 160:3,11 161:8 161:11,16 163:1,4,8 169:25 170:1	170:17 172:22 173:9,10 178:18 180:22 180:23 208:17 213:19,20 214:2,4,24 216:5,8,11,24 217:4,23 218:6 218:11 221:17 240:8 268:9 271:24 299:13 300:3,16,23,24 301:6,7,13,23 301:23 302:24 302:24 303:7,9 303:17,18,25 <b>space</b> 169:21 <b>spasm</b> 155:17 <b>SPCC</b> 66:12 <b>speak</b> 77:11 108:22 157:2 233:10 <b>speaking</b> 78:11 <b>special</b> 43:12 146:18,21 <b>specialist</b> 41:25 43:17,25 45:16 <b>specific</b> 67:16,21 75:3,5 93:17 101:3 115:13 115:22 130:3 145:25 150:2 173:11 195:7 225:13 228:2,5 276:1 300:10 <b>specifically</b> 4:9 4:11 77:17 112:20 124:14 128:3 228:6 252:19 277:14 <b>specifics</b> 128:14	227:18 <b>speckled</b> 179:13 <b>speculation</b> 109:9 <b>spent</b> 34:19 178:1 <b>spill</b> 66:8,10,11 66:20 156:10 156:12,22 157:5 <b>spilled</b> 156:12 156:13,15,21 303:13 <b>spill-control</b> 66:23 <b>splash</b> 148:5,5 299:24 <b>spoke</b> 219:4 254:24 <b>spoken</b> 263:10 <b>spokes</b> 102:4 111:17 <b>spot</b> 42:2 97:18 229:5 <b>spots</b> 36:13 43:9 <b>sprayed</b> 144:9 <b>spread</b> 69:11 <b>spreadsheet</b> 54:6 65:20 85:14 198:19 199:13 <b>spreadsheets</b> 50:13,15,19 51:9 52:2 53:4 54:20,21 <b>SQT</b> 296:21 <b>square</b> 58:17 <b>St</b> 27:19 <b>stability</b> 153:18 <b>stack</b> 49:15 52:18,22 54:3	54:4,6,16,22 55:4,7 56:2 61:22 62:3,12 64:18 66:1 83:5,9 87:1 117:7,8 245:17 273:22,25 <b>Staffing</b> 261:14 262:1 <b>stages</b> 141:18 <b>stairs</b> 39:25 40:9 40:10 <b>stamp</b> 22:23 <b>stand</b> 150:21,21 <b>standard</b> 21:14 30:20 40:7 41:14 59:19 114:9 143:11 246:11 247:7 248:6 <b>standards</b> 18:5,6 18:9,9,16,17 117:14,15 247:15 <b>standing</b> 40:4 43:22 150:24 216:12 <b>standpoint</b> 137:6 215:15 228:22 <b>start</b> 33:7 35:15 35:17 42:22,24 52:4 67:21 128:16 129:13 129:25 187:11 187:12 200:13 223:13 224:24 225:20 226:10 226:12,18 243:22,24 250:18,20
--	--	---	---	---



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

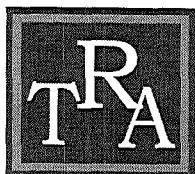
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

255:19 269:16 280:14 282:25 289:10 <b>started</b> 22:16 25:3 26:14 30:3 37:10 44:5,10,18 46:3,5 47:25 56:9 62:25 70:21 72:8 75:11 83:22 92:9,14 136:7 173:4 181:7 194:14 198:12 201:19 212:15 226:20 227:8 236:6 250:16 251:16,25 254:2,2 278:4 280:3 283:7,10 284:4 290:12 <b>starting</b> 42:6 70:23 73:11,21 74:10 223:25 228:4 234:16 275:7 278:10 280:10 281:9 <b>starts</b> 7:24,24 <b>startup</b> 226:7 227:4,12 229:9 250:4 252:14 266:22 275:21 275:22 277:1 <b>start-up</b> 225:22 <b>state</b> 1:14 4:19 5:8 67:11 147:14 156:6 176:17 205:4 207:17 254:23 255:18 256:11 274:23 285:21	301:10 304:5 306:4 <b>stated</b> 105:23 269:24 <b>statement</b> 258:8 258:12 281:8 <b>statements</b> 114:3 <b>states</b> 1:1,4 144:24 304:4 <b>stating</b> 208:24 292:6 <b>status</b> 225:23 226:7 236:22 250:6 <b>status/edit</b> 236:21 237:4 <b>statute</b> 173:3,4,6 173:8 306:18 <b>stay</b> 6:13 28:22 45:8 48:22 137:23 138:11 170:19,21 266:6,8 <b>stayed</b> 23:1 24:5 28:11 33:10 100:23,24 <b>stays</b> 236:20 <b>stenotype</b> 306:11 <b>Steve</b> 40:21 41:2 41:13 254:23 <b>stick</b> 212:19 303:6 <b>sticks</b> 262:2 <b>stipulated</b> 4:3 <b>stitches</b> 133:24 208:6 <b>stood</b> 63:8 <b>stop</b> 8:9 33:15 125:11 175:6	<b>stopped</b> 72:5,7 <b>stops</b> 86:14 <b>storage</b> 36:24,25 151:8 <b>storefront</b> 24:11 <b>storm</b> 66:13,18 67:13 <b>storm-water</b> 66:15,24 100:16,25 <b>straight</b> 37:23 249:24 <b>streams</b> 169:18 <b>STREET</b> 1:19 2:8 <b>streets</b> 59:21,21 <b>strike</b> 200:18 237:18 <b>stripping</b> 36:20 <b>strong</b> 292:1 <b>stuck</b> 41:18 <b>stuff</b> 32:4,10 42:10,12 65:19 86:5 87:24 117:16 119:12 120:1 164:15 194:4 255:20 266:3 <b>Sturgen</b> 104:14 <b>subject</b> 296:25 <b>submit</b> 55:21,25 <b>submitted</b> 67:11 <b>substance</b> 7:10 142:10,10 173:2 <b>Substances</b> 142:11 <b>success</b> 222:16 222:21,21 <b>sudden</b> 136:7 <b>sugar</b> 164:16	<b>suggest</b> 282:14 282:14,17,22 <b>suit</b> 135:3,7 151:19,25 152:9,11,12,15 152:19,23 153:6 214:6 215:12 <b>SUITE</b> 1:19 2:5 2:8 <b>sulfur</b> 34:20 85:12 87:15,22 141:11,13,16 141:18,23 143:3 144:4,8 149:15,24 151:4,8,14,18 151:24 152:24 153:13,21,24 154:18,22 155:1,11,16,24 156:15,16 168:3 178:2 262:3 296:22 297:13 301:24 303:23 <b>sulfuric</b> 141:17 141:20 178:1,1 <b>summary</b> 213:6 <b>summer</b> 21:6 <b>sums</b> 67:6 <b>Sunday</b> 224:23 229:19 251:22 251:23 252:23 257:1 <b>sunrise</b> 162:18 162:23 <b>super</b> 70:11 107:8 108:24 113:11 167:7 167:24 171:16	173:17 200:4 201:2 202:4 222:17 <b>supervision</b> 217:15 241:4 306:13 <b>supervisor</b> 28:11 31:10 32:5 38:19,22 40:16 40:19,22 56:9 60:20 76:23 104:9,10 186:7 209:17,23 229:13 241:11 264:11 <b>supervisors</b> 27:14 28:10 30:22 31:7 <b>supervisory-ty...</b> 58:19 <b>supervisor's</b> 39:1 58:1,21 <b>supplement</b> 264:2 <b>supplemental</b> 264:5 <b>supplementing</b> 265:3 <b>supply</b> 278:12 278:14 <b>support</b> 280:9 281:8,23 <b>supposed</b> 37:11 97:2,15 98:25 116:17 134:9 240:25 241:6 243:4 <b>sure</b> 18:22,23 19:21 25:13 33:9 65:13 67:17 77:10,11
---	--	--	--	--



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

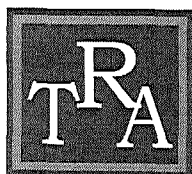
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

88:17 92:6	<b>S13Z</b> 127:15	104:21 106:17	104:25 115:10	179:21 295:22
100:2 103:23	<b>S8Y</b> 247:7 248:3	114:4 137:5	121:23 130:3	296:2
106:25 118:12		201:10 218:17	136:23 139:11	<b>Teddy</b> 96:23
119:4 122:3,18	<b>T</b>	219:24 244:18	145:10 147:18	229:25 230:1
122:21,22	<b>T</b> 4:1,1	260:20 261:19	159:17 160:14	<b>telephone</b> 127:3
123:6 138:1	<b>table</b> 8:11	263:1 274:7	160:16,17,19	<b>tell</b> 9:2 13:11
146:6 161:14	235:22	275:25 287:12	161:7 171:21	17:2 23:25
164:21 165:20	<b>tailback</b> 22:8	294:5,10	174:8,23	41:10 48:22
167:5 201:7	<b>take</b> 8:9,12,18	295:14,15,18	195:12 204:5	59:11 62:23
204:23 205:1	8:20,20 22:3	297:17 301:25	215:3 223:17	74:15 78:9
207:11 212:1	41:20 56:19	301:25 302:19	224:9 233:3	85:6 108:4
212:15 227:4	57:3,8,18,23	<b>talked</b> 23:6 70:2	235:3,14	113:15 116:5
227:14,19	58:23 59:3,7	74:24 78:3,21	239:24 250:1,9	117:6,19
234:15 253:5,7	60:4,14 65:7	83:3 94:22	261:5 267:8	120:10,14
255:20 294:13	83:16 103:10	95:15 100:6	277:6,9 279:4	124:25 129:6
<b>surface</b> 64:22	123:10 143:1	107:10 110:1	293:10 295:13	134:9 145:7
<b>surprise</b> 80:23	160:8,9 186:8	110:12 111:14	302:17 303:12	152:4 158:12
<b>surprised</b>	186:15 193:17	113:18 114:6	<b>talks</b> 52:5	163:18 170:3
164:10	215:8 225:11	118:24 125:24	294:18	171:24 178:14
<b>swallow</b> 148:23	228:17 234:18	129:4,17	<b>Tammy</b> 10:3	178:20,21,22
<b>switching</b>	239:18 244:14	168:13 178:12	11:23	178:23 179:5
125:10	245:20 251:6	178:14 179:9	<b>tanks</b> 36:24,25	181:12 186:3,5
<b>sworn</b> 5:2 306:7	262:22 264:2	191:14 195:6,9	<b>target</b> 149:16,25	188:3,5 195:8
<b>system</b> 50:20	273:13 274:15	195:14 200:10	150:9,16	202:16 213:15
55:1 71:5	296:15 298:23	215:1 244:22	<b>task</b> 29:10 214:1	215:21 219:21
94:10 95:1	<b>taken</b> 1:12 4:6	253:19 262:6	215:14	222:25 226:2
105:5 114:13	72:3 118:8	263:15 265:2	<b>tasks</b> 50:22	230:24 248:13
114:20 115:18	122:4 125:17	274:13 285:10	213:12,16	249:22 250:11
116:11,13,15	126:20 247:1	287:6 294:11	<b>task-wise</b> 213:12	250:13 256:7
121:17 171:8	263:6 306:6	302:22 303:15	<b>taught</b> 97:1	256:14 258:6
183:14 192:24	<b>takes</b> 78:25	<b>talking</b> 7:24	<b>teacher</b> 20:25	262:9 271:22
202:11 242:9	123:23 124:1,8	13:13 16:11	21:1,21	272:12 276:10
251:18 260:12	228:14,23	65:11,22,25	<b>team</b> 294:9	276:20 277:17
260:12 273:11	229:5	67:21 68:11	<b>Tech</b> 204:2,4	280:15 288:21
273:18,21	<b>tale</b> 138:25	70:10 74:4	<b>technical</b> 102:6	288:22 289:3,4
<b>systems</b> 53:9	<b>talk</b> 8:2 9:7,17	76:1 86:18	<b>technician</b>	289:5 290:14
106:7 168:11	10:9,13,20	88:1,17,23	260:13	301:6 303:3
217:11	11:5,18,24	92:7,13,20	<b>technicians</b>	<b>telling</b> 6:18 74:3
<b>S1Z</b> 19:9 127:15	12:12,17 23:10	93:11 94:17	260:10	138:25 216:15
<b>S13V</b> 246:4,11	34:16 65:8	95:24 96:13	<b>technology</b> 29:4	216:21 256:18
247:11	83:4 101:24	100:16 104:12	29:5 55:1	280:13 282:25
	102:1,2,5			



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

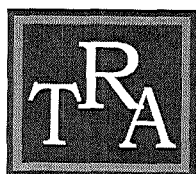
[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA  
 225.751.0732  
 225.752.7308 FAX

New Orleans, LA  
 504.392.4791  
 504.392.4852 FAX

1.866.982.6878 TOLL FREE

<b>tells</b> 17:22 116:17 131:14 159:22,23 213:14 216:1 217:15,18 246:25 298:22	72:12,22 106:11 217:21 256:24 280:2 284:4 <b>testify</b> 306:8 <b>testifying</b> 161:15 <b>testimony</b> 69:21 71:2 72:18 126:6 138:9 257:2 287:10 302:16 306:5 306:10 <b>testing</b> 50:6,16 50:25 58:14 59:16 118:13 118:14,20 119:1,3,5,6,14 121:1,4,16,23 172:22 174:18 174:20,21 292:2 <b>tests</b> 49:15 56:24 57:5 58:16,18 59:7 60:17 66:5 <b>test-run</b> 131:23 <b>test-taking</b> 59:9 <b>Texas</b> 20:2,2,8,9 20:21 22:19,21 61:9 103:9 <b>text</b> 13:1 <b>texted</b> 13:2,4 <b>Thank</b> 126:24 299:6 <b>theirs</b> 148:8 <b>theme</b> 43:2 <b>thereof</b> 4:15 <b>thermometer</b> 158:17 <b>they'd</b> 269:20 <b>thickness</b> 118:10	118:20 119:1,3 119:5,14 120:5 120:10,17,24 121:24 <b>thin</b> 291:11 <b>thing</b> 7:20 8:3,5 11:7 29:12 35:18 44:9 65:21 87:18 129:16,21 131:25 139:6 147:20 163:12 166:14 173:5 201:22 205:7 213:15 227:23 240:7 261:10 274:1 275:12 299:3 <b>things</b> 6:15 13:5 13:6 15:5 17:22 25:5 29:5 30:19 34:24 36:25 39:22 40:1,4,7 41:16 42:3,13 43:14 44:13 47:24 48:2 49:2,10,15 52:13 53:19 60:11,23 62:1 64:9 70:23 83:5,7 87:15 90:10 105:12 106:9,10 113:20 117:1 118:12 121:4 128:17,25 130:4,12 131:18 138:8 142:8 151:2 158:23 160:7	166:19 169:19 201:23 209:6 217:8 227:4 242:9 254:3 262:6,10 266:10 268:7 277:10 279:7 286:20 292:23 293:6 294:8 297:6,16 302:22 <b>think</b> 7:5,15 8:10 9:17,25 11:2,16,25 14:13 15:11 18:4 19:7 21:14 24:4 25:17 26:9 27:6,9,23 31:6 31:6 34:2,4,5 38:5,10 41:9 42:1 43:25 44:18 45:3 47:15 48:14 50:5 53:9 56:17,19,23 58:4,7 59:8,17 60:2,12,18 62:6,6,18,21 63:7,13,16,17 64:13 65:11 66:17,21 69:1 69:5,11 70:15 70:22 72:11 73:5,14,16 75:22 76:17 77:22 78:10 79:3,6 80:17 81:2 82:1,9,12 82:12 83:2,2 83:10 84:24	85:9,18 87:7 87:13 88:3,4 88:13 89:21 90:3,4,18,21 91:3,8,11,17 92:21,23,24 93:1,1,7,8,9,10 93:16,18,20,24 94:17 96:13,17 97:5,7,20 99:4 99:9,19 100:9 100:23 101:11 102:8 103:19 104:8,16,20 105:10,20 107:12 109:23 110:8 111:18 114:2 118:2,12 119:19,19 120:2 121:18 123:17 127:22 128:13 129:7,8 129:10,25 130:20 131:3 131:20 132:7 132:19,24 136:20 139:14 142:8,12,13 143:25 144:2 145:12 147:4 148:8,19,21 150:17,20,22 150:22 151:6 153:17 154:12 155:23 156:14 157:13 158:24 159:13 161:16 161:19 163:21 164:3,20 167:4 168:7,16 169:6 169:10,22
--	--	---	--	---



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

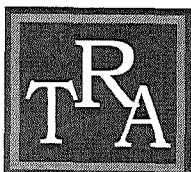
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

170:1,21	260:2 261:4,13	146:23 236:19	142:1 148:18	65:18 66:2
171:25 173:22	261:20 267:8	<b>threshold</b>	149:7 151:22	69:3 83:2
174:19,21	267:16,20	131:20,21	162:6,8,11,14	84:24 181:21
175:6,6,11	269:1 270:12	<b>throat</b> 148:7,10	162:22 171:22	<b>TLM</b> 242:14
178:2 181:7,18	270:17 273:25	148:14,21	178:12 179:9	<b>today</b> 8:14 9:3,9
183:20 184:3	274:16,20	149:1 155:13	180:12,20	16:16,20 45:17
184:10,20	275:5,11,23	303:10	182:3 185:12	67:25 70:5
188:1 191:6	276:9 278:1,15	<b>through-put</b>	194:11 195:9	78:11 79:12
195:11,24	280:12 281:1	85:7,7,15	196:16 206:2	92:13 96:7
196:22,23	284:3,8 286:11	86:25 87:8	207:1,20 210:2	98:22,24 99:8
197:8,17	286:18 287:6	88:4	211:17,19,20	169:10 229:7
198:21 199:10	288:20 289:2	<b>throwing</b> 103:21	214:21 216:22	265:19 267:21
200:14 203:1	290:9 291:7,22	<b>Thursday</b> 11:10	218:23 219:9	270:4,5,8
203:15 204:19	292:9 294:11	<b>till</b> 24:24 160:10	219:12 223:22	274:9 281:6
205:6 207:16	294:19,24,25	<b>time</b> 4:14 6:1 7:2	224:24 226:9	284:4 289:12
207:17,17,18	295:25 296:12	7:4 12:25	226:10,11,15	295:13,17
209:17,19	301:9,14	13:11 16:24	230:2,3 231:17	<b>Todd</b> 9:25 10:5
210:7 211:1,17	302:10 303:12	17:3,13 22:1	232:10 233:12	10:9 11:3
212:10 213:23	303:25 304:25	29:17 30:10,11	241:3 242:20	<b>Todd's</b> 10:5
214:15 215:22	305:11	31:16 32:11,22	250:18,22,23	<b>told</b> 9:25 13:1
218:1,10,11,12	<b>thinking</b> 20:24	33:4,11 34:21	254:17,21	15:11 31:3
219:3 220:12	21:1 54:19	35:24 37:21	258:3 261:5	40:15 41:2,2
220:15 221:10	89:2 116:8	38:5,7,8,12	262:6 264:12	41:15 53:22
222:10 226:13	218:14 239:2	42:25 43:5	268:12 276:18	90:19 94:25
226:24 227:1	248:12 250:22	48:24 49:11	283:21 292:3	107:5 110:21
227:16 232:17	257:14 299:2	50:4 68:17	299:22	110:22 111:1
232:18 233:12	<b>third</b> 64:23 66:2	70:17,19 71:9	<b>times</b> 7:12 31:18	112:4,23 113:5
233:18 234:18	154:10	71:14,19,21	49:16 99:13	113:9,24
235:8,19	<b>Thomas</b> 237:4	72:1,2,8,13,24	110:17 135:19	122:20 133:18
236:11,13,16	<b>thought</b> 96:19	76:10,20 77:14	139:22 162:20	138:5 163:17
237:16 238:5,7	106:11 107:14	77:17,19 78:3	183:6 233:9,11	171:21 172:1
238:11 239:11	107:17 126:13	78:20,21 85:4	278:25	172:13 176:10
241:14 243:8	138:24 217:22	85:17 87:7	<b>timing</b> 62:6	177:15 180:25
244:11 245:2	218:8 219:6,10	88:5 90:5 91:2	141:8	181:2 185:21
245:12,13	224:24	93:11,18,22	<b>tired</b> 21:24	186:4,19
249:12,19	<b>three</b> 9:5 13:2	99:20 121:3	<b>tissue</b> 144:9	194:18,21
252:25 253:3	22:10 24:6	128:12 129:4	<b>title</b> 44:21 45:10	226:6,19 228:6
255:11 256:4	62:8 66:6	129:17 131:22	45:10,14,16,17	250:5 251:10
256:21 257:12	73:15 79:11,13	135:10 136:1	45:19 46:4	252:17 258:4
259:3,13,14,15	80:16 82:3	139:6 140:12	47:2 48:11	259:22 261:8
259:19,22	100:12 101:11	140:17 141:15	63:6,11,20,25	262:6,11,15,20



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

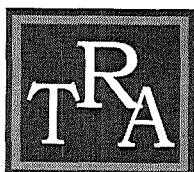
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

262:20,21,23	154:1 173:2	303:13	<b>true</b> 148:6	168:20,22
265:3 275:6,9	<b>toxicity</b> 146:18	<b>transcribed</b>	151:17 155:16	169:1,7,11
275:20,23	146:21	306:12	158:1 164:25	230:23
276:1 277:8,11	<b>toxicological</b>	<b>transcript</b> 1:10	165:25 166:3	<b>tubes</b> 158:11,20
278:1,15,22	146:14	306:14,16,17	187:24 297:22	158:22 159:1
279:6 280:17	<b>track</b> 17:17	<b>transfer</b> 212:5	306:13	168:19,21
283:4,5,6,8,12	120:24,25	<b>transition</b> 47:20	<b>truth</b> 6:18	169:5
283:19 290:8	<b>tracking</b> 236:21	48:4,7	258:20	<b>Tuesday</b> 261:24
301:16	237:4	<b>transparency</b>	<b>try</b> 8:1 34:12,14	267:13
<b>Tom</b> 10:4 12:14	<b>tracks</b> 159:25	172:11	37:21 58:23	<b>turn</b> 55:11
56:10,10 77:4	<b>tract</b> 144:11	<b>travel</b> 157:19	81:4 123:8	299:24
81:3 85:25	155:6,10,13	<b>traveled</b> 157:5	137:22 138:10	<b>turnaround</b>
86:7,11 90:21	<b>trail</b> 111:9,13	157:15	159:4 171:4	71:13 162:9
93:7,8,21	112:12,13,19	<b>traveling</b> 176:20	186:16 225:19	221:24 222:3,6
94:17 95:21	<b>train</b> 30:14	<b>treat</b> 43:22	227:4 263:1	224:7 251:8
96:22 97:11	204:11	<b>treatment</b> 209:1	269:1,23	266:22,24
98:12 104:7,8	<b>trained</b> 28:20	<b>trickled</b> 274:21	273:16 280:17	267:4 269:18
201:8 204:16	138:18 176:11	<b>tried</b> 37:21	280:21	282:21 287:17
204:22 205:21	204:1,12	57:22 174:12	<b>trying</b> 36:24	287:21 288:15
206:18 219:18	293:24	212:5	53:12 56:17,19	290:4 291:10
229:12 232:20	<b>trainee</b> 80:17,21	<b>trioxide</b> 141:11	91:13 99:9	<b>turning</b> 61:7
237:5,19	<b>training</b> 26:18	141:13,16,19	105:10 106:19	<b>twice</b> 49:19
241:17 260:5,6	26:21,23 27:2	141:23 143:3	108:17 117:3	<b>two</b> 7:11 9:5
286:15,16	27:4,11,12,17	144:4,8 149:15	131:19 176:3	20:7 24:5,8
<b>tons</b> 35:5	28:9,14 30:16	149:25 151:4,8	191:24 224:1	25:16 27:9
<b>tools</b> 168:16	43:6 47:20	151:15,18,24	225:4 243:23	60:18 62:22
169:13,24	56:5 57:12,16	152:24 153:13	259:13 262:21	64:14 65:23
<b>top</b> 28:6 87:19	60:24 61:3,4,5	153:21,24	280:15 298:25	73:15 79:6,22
137:20	61:9,10,14,17	154:18,22	<b>TSCA</b> 68:11	80:18 96:6
<b>topics</b> 125:10	61:18 95:14	155:1,12,17,24	173:1,2,8,13	99:7 105:17
<b>total</b> 140:12,15	102:5 105:6	156:15,16	173:19,25	106:21 123:19
<b>totally</b> 84:5	114:6,16,25	168:4 178:2	174:2,9,13	156:25 158:13
101:8 303:22	118:8 156:5	262:3 296:22	175:3 242:19	180:19 206:1,3
<b>totes</b> 156:23	157:7 173:5	297:13 301:24	242:21 243:5	206:16 219:15
<b>tough</b> 257:19	180:22 217:20	303:23	243:11,19,20	238:23 267:17
<b>tour</b> 83:11,12	217:24 218:2	<b>trooper</b> 256:18	244:16 304:7	278:7 283:17
279:13	242:13,14,15	<b>truck</b> 140:10,10	304:21,23	287:5 296:1
<b>tower</b> 36:19,19	242:17,23	245:5,8	305:4	<b>type</b> 6:15 25:4
36:20	245:20,24	<b>trucking</b> 245:12	<b>tube</b> 158:9,13,14	29:5 34:24
<b>toxi</b> 142:10	293:16,19	<b>trucks</b> 43:3	159:12,19	36:25 39:22
<b>toxic</b> 142:11	301:5,10	85:11 245:7	168:14,17,18	40:1,7 43:14



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

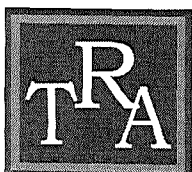
Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE



44:13 49:1,15 52:13 53:19 59:20 60:11 64:9 68:19 83:5 87:15,18 106:9,10 113:20 115:13 115:20 117:1 120:15,20 121:4 128:16 142:8 151:2 163:12 166:14 166:18 169:14 169:19 201:22 207:13 213:15 236:11 240:9 242:9 261:10 <b>types</b> 49:4 67:9 75:20 97:24 104:15 114:8 129:23 292:14 300:9 <b>typical</b> 18:4 50:25 58:21 167:8 <b>typically</b> 32:24 38:18,20 76:13 81:3 97:3 128:14 129:25 133:20 138:7 145:17 156:22 156:23 158:13 184:4 258:18 263:4 <b>T.J</b> 1:11 5:1,10 171:19 226:22 229:7 275:24 306:6	<b>uh-huh</b> 8:5 37:8 60:1 69:23 70:20 82:17 137:21 177:11 182:2 186:4 189:16 205:23 213:5 233:1 235:13 287:25 <b>UltraPIPE</b> 119:21,23 <b>unannounced</b> 101:8 <b>uncommon</b> 146:15 294:7 <b>undated</b> 193:7 <b>undergo</b> 153:24 <b>undergoing</b> 293:16 <b>understand</b> 7:17 8:15 14:23 17:7 53:12 68:4 91:14 106:19 113:19 117:3 141:2 143:14 149:9 151:2 176:3 186:20 191:24 224:1 225:4 228:16 269:4 272:23 274:1 288:22 289:9 290:10 298:19 300:6 <b>understandable</b> 178:25 <b>understanding</b> 13:12 68:8,9 70:13 71:5 72:6 90:2 93:4 107:14 121:6 122:24 124:13	135:14 138:14 144:19 149:14 149:23 151:3,7 151:14 155:11 163:25 164:4 165:10 171:14 172:19 173:7 176:5 182:22 182:23 194:22 218:22 224:16 224:18,19 269:7 270:22 276:13 288:3 293:1 298:16 301:21 306:15 <b>understood</b> 73:18 90:2 123:17 163:21 233:3 294:20 <b>UNITED</b> 1:1,4 <b>universities</b> 207:17 <b>university</b> 20:17 20:19 204:5 <b>update</b> 52:2 67:4 <b>updated</b> 248:21 248:22 <b>upfront</b> 41:1 <b>upwind</b> 137:23 138:11 <b>Urges</b> 292:11 <b>use</b> 50:17 52:12 65:18 77:3 96:17 124:23 137:22 158:22 159:12 169:10 169:13 235:7 243:17 245:23 247:2 285:2 299:11 <b>uses</b> 213:23	<b>usually</b> 32:3 38:19 64:10 65:19 83:7 87:24 96:3 97:25 99:22 158:14 162:21 168:6 183:23 183:24 185:13 209:22 225:20 231:18 258:2 258:19 <b>utility</b> 42:17,17 42:19	300:25 301:2,3 301:7,23 302:1 302:15,20,24 303:1,5,9,9,18 303:18,25 304:2 <b>vapors</b> 297:2,3 297:17 <b>various</b> 167:22 190:17 <b>vendor</b> 66:16 <b>vendors</b> 64:8 65:12,24 <b>verbal</b> 91:18 92:2 186:16,18 <b>verbatim</b> 69:18 255:14 257:15 <b>Vernon</b> 10:2 <b>version</b> 143:9,15 171:19 246:10 248:6,19 <b>versus</b> 1:6 91:18 301:23 <b>vessel</b> 119:4 120:6,10,18,18 120:24 190:19 190:25 191:19 273:24 288:4 290:15 291:11 291:18 <b>vessels</b> 36:10,17 70:24 71:3,7 71:24 74:24 109:4,5,13 112:20 119:5 119:15 120:6 122:4,10,18 123:4,7 170:25 223:6 225:7 267:3,22 270:14,23
<b>U</b>			<b>V</b>	
<b>U</b> 4:1 <b>ugly</b> 156:19			<b>V</b> 63:6,11,20,25 65:18 66:2 83:2 84:24 <b>vacation</b> 13:6 31:17 <b>vacuum</b> 71:5 94:10,25 114:12 167:10 168:10 171:1 217:11 251:18 <b>Valentine</b> 10:1 10:17 31:9 285:20 <b>valve</b> 275:8,16 275:21 276:11 277:1,12 278:3 278:12,17 279:16,21 281:2,10 283:9 <b>Vandall</b> 104:14 <b>vapor</b> 151:20,25 152:15 159:17 159:18 182:1 182:18 297:10 297:14 299:9 299:10,25 300:2,4,15,16	



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

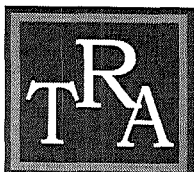
New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

282:20 289:13 290:24 294:21 300:2,4,5,16 300:22 <b>vicinity</b> 216:5 <b>video</b> 126:13,19 257:16,18 285:1,2,7,8 <b>view</b> 297:7 299:1 <b>violently</b> 154:1 <b>Virginia</b> 204:2,4 <b>visibility</b> 160:1 <b>visible</b> 36:4 160:7 161:12 163:2,3 170:2 170:6,15 216:8 217:2 274:1 <b>visibly</b> 245:17 <b>visit</b> 78:24 80:23 82:14 84:5,8 84:22 85:1,16 95:8 96:13 98:10 99:4,19 99:23 100:1,5 100:10 101:22 104:4,6,21 107:13 <b>visited</b> 26:7 96:4 <b>visits</b> 85:5 95:16 99:7 100:12,13 <b>Volks</b> 292:9 <b>volume</b> 300:12 <b>voluntarily</b> 24:18 25:8 <b>volunteer</b> 84:16 <b>volunteered</b> 25:9	210:8 216:18 <b>waited</b> 56:15 <b>waiting</b> 110:8 111:18 263:3,7 263:21 <b>waived</b> 4:9,11 <b>Wak</b> 180:1 <b>walk</b> 40:10 82:25 137:23 138:2 170:14 170:18 214:14 214:15,17 215:7 216:24 227:24 251:20 252:6,19 266:2 266:3 <b>walked</b> 83:17 85:2 95:4 <b>walking</b> 135:17 136:22 216:10 216:21,23 298:25 <b>walks</b> 216:15 <b>walls</b> 120:6 291:11 <b>want</b> 17:1 21:24 33:9 80:2 102:2 104:21 114:20 146:6 154:5 159:18 164:20 165:20 167:23 170:13 208:16 210:10 212:16 215:5 217:14 251:11 295:22 296:1 <b>wanted</b> 15:6,17 18:15 35:8 54:22 58:3,23 82:25 100:24 102:1 124:18	124:19 125:20 126:1 136:25 141:6 159:9 169:10 170:12 170:22 234:9 235:4,17 243:21,23 260:7 263:17 <b>wanting</b> 109:3,5 <b>wants</b> 286:12 <b>warm</b> 33:10 <b>warning</b> 171:8 <b>wasn't</b> 21:23 25:2 34:22 35:19 36:12 41:20 47:22 60:2 72:1 94:8 96:15 107:11 110:22 118:6 129:12 139:18 191:17 211:13 217:7 220:3 225:13 230:15 231:21 253:14 259:17 279:4 286:25 300:14 <b>watch</b> 7:20 35:22 36:3 138:10 170:6 <b>watching</b> 30:17 <b>water</b> 49:7,13,14 62:25 64:21 65:4 66:13,18 67:13 100:17 153:14,22 154:1 <b>watering</b> 261:9 <b>way</b> 15:12 16:3 34:15 61:24 67:12,19 74:1 75:17 80:18	81:10 86:1,13 89:24 106:23 109:15 116:4 116:15 121:7 123:11 124:16 124:23 125:4 139:2,5 156:19 157:9 159:24 160:4 165:18 166:16 176:11 178:25 179:3 180:25 181:1 181:11 191:16 199:3 202:10 221:21 222:12 227:25 230:10 234:3 243:11 243:14 244:5 268:15 269:17 272:17 274:3 293:14 295:24 299:12 <b>ways</b> 26:22 124:25 <b>wear</b> 129:10,14 135:20 157:23 213:12,14,16 213:18 214:2,3 214:12 215:1 215:21 216:5 217:10,14,16 219:5 301:16 303:2,4 <b>wearing</b> 135:19 135:24 136:5,8 136:10,15,17 136:24 139:6,9 140:4,6,24 218:25 298:22 <b>web</b> 63:22 <b>website</b> 248:14	<b>Wednesday</b> 11:9 267:13 <b>week</b> 13:6 61:10 261:23 263:19 <b>weekend</b> 224:19 224:25 225:2 225:22 <b>weekly</b> 54:20 <b>Weiner</b> 1:18 2:7 2:8,18 13:14 14:2,4,10 15:1 15:8,13,20 16:10,23 19:5 19:13,17 65:6 72:15 73:2 79:15 80:6 84:1 88:16,22 89:1 91:16,21 99:15 105:21 107:20 108:3 109:7 110:2,15 110:20 112:1 112:25 113:13 125:9,15,22 126:8,14,23 127:7,21 133:4 133:9 134:22 136:13 144:12 145:14,24 146:5 149:17 150:1 154:9 187:1,5,15 188:2 189:4,9 189:15 193:8 196:4 198:20 219:20 220:22 234:19 235:21 238:17 247:5 247:10,20 253:15 264:7 264:15,22
--	---	---	---	---

## W

**Wade** 10:2 11:4  
**wait** 38:1 65:2  
98:5 197:18



## TORRES REPORTING &amp; ASSOCIATES, INC.

COURT REPORTING &amp; LITIGATION SERVICES

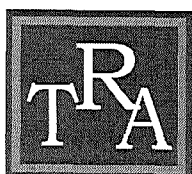
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

265:7 272:1,6 272:21 276:21 277:2,13 278:23 279:23 281:18 284:12 288:16 289:19 296:13,19 298:5,15 299:4 301:22 302:11 <b>weld</b> 169:21 269:19 <b>welders</b> 238:23 292:11 <b>welding</b> 106:9 287:14 289:8 <b>Welfare</b> 22:20 22:22 <b>wells</b> 64:20,21 <b>went</b> 22:1,19 24:9 43:15 45:6 61:10 63:21 83:2,10 83:11,17 85:15 93:9 94:6,23 114:18 130:19 134:14 137:11 137:15 190:3 191:5,22 195:21 196:12 206:16,17 211:10 212:3,4 218:23 219:9 223:1 253:12 254:3 256:11 256:13,25 257:20 260:14 262:7,10,25 297:6 <b>weren't</b> 57:2 128:4 198:7 215:19 217:5	250:3,5 290:9 <b>west</b> 83:20 <b>we'll</b> 7:22 78:12 79:12 127:4 142:24 181:18 187:11 188:12 188:13 193:9 205:18 210:21 241:23 248:20 248:23 261:16 276:10 <b>we're</b> 15:5 146:4 160:16 165:20 234:16,25 246:22 <b>we've</b> 69:24 75:16 123:16 159:14 189:22 265:1 278:25 <b>wheel</b> 111:18 <b>whichever</b> 19:1 <b>whistles</b> 171:9 <b>white</b> 154:20 178:23 179:7 <b>Whitlow</b> 245:22 292:15 <b>Wiener</b> 67:24 <b>Wilcox</b> 28:13 31:4 <b>William</b> 23:11 <b>Williams</b> 100:18 101:2 184:17 <b>window</b> 133:22 <b>windsock</b> 137:17,22 138:4,6,10 <b>witness</b> 4:5,21 72:19 73:4 80:8 84:3 88:19,24 89:4 113:4,17	145:16 146:13 149:20 154:13 187:17 188:8 189:17 198:22 219:23 221:2 247:13 253:17 272:8 277:16 284:18,22 288:19 289:22 296:17 298:12 <b>witnesses</b> 265:3 <b>wonder</b> 139:3 <b>word</b> 50:17 60:8 79:24 190:7,15 190:22 192:25 218:12 219:1,3 219:7 226:16 255:13 278:3 <b>wording</b> 67:17 67:20 <b>words</b> 196:13 213:23 269:22 271:11 <b>wore</b> 135:18 <b>work</b> 7:22 9:11 22:19 23:13 24:1,9 25:15 31:18 32:15 33:11 37:7,20 43:24 48:21 49:4 62:9 63:9 66:23,24,25 81:7 92:8 103:7 118:15 124:2,5 126:21 133:24 162:4,8 162:21 179:23 179:25 180:1,6 204:13 209:2,3 215:13 216:14 222:24 223:2	223:16,20,21 226:11,12 227:16 230:6 232:11 243:13 252:3 256:12 264:4 267:10 267:19 273:14 280:14 288:1 294:9 <b>worked</b> 22:18 31:14,14,19 43:8 47:16 48:1,1,4 49:23 49:25 64:14 162:6,11,14 270:2 285:4 290:14 292:6 <b>workflow</b> 236:18,18,22 <b>working</b> 17:3 22:16 23:23 30:3 31:13 41:12 44:10,14 48:23 56:9 61:8 74:13 162:9 207:19 213:18,20 214:24 215:18 215:19,20,22 215:23 216:2,4 218:5 225:15 225:15 260:4 263:18 265:13 270:1,6,7 <b>works</b> 7:18 118:16 293:2 293:14 <b>world</b> 17:20 29:6 41:17 <b>wouldn't</b> 52:12 71:11 112:8	157:20 186:8 208:2,9,14 229:18 <b>write</b> 97:17 210:11 258:19 279:3,5,7 <b>writes</b> 98:9 <b>writing</b> 204:25 244:8,10 258:19 295:10 <b>written</b> 75:17 86:13 91:18,25 92:12 244:7 258:7,8 259:14 259:15,15 276:6 <b>wrong</b> 278:5 <b>wrote</b> 256:7,8 258:7,14 259:20 <hr/> <b>X</b> <hr/> <b>X</b> 2:13 <hr/> <b>Y</b> <hr/> <b>Yanfu</b> 80:13 <b>yeah</b> 6:14 14:21 15:23 17:7 22:4 31:14 42:3 62:4 64:25 66:4 69:2 71:17,23 79:18 80:24 84:4 86:21 87:23 88:12,25 89:5 96:12 101:6 102:15 106:21 123:17 124:22 125:13 127:19 129:17 130:21 134:6 136:17 139:1
--	---	---	---	--


**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING &amp; LITIGATION SERVICES

[tra@torresreporting.com](mailto:tra@torresreporting.com)  
[www.torresreporting.com](http://www.torresreporting.com)

Baton Rouge, LA

225.751.0732

225.752.7308 FAX

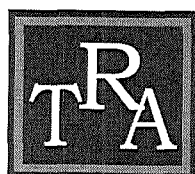
New Orleans, LA

504.392.4791

504.392.4852 FAX

1.866.982.6878 TOLL FREE

147:22 153:19	<b>year-and-a-half</b>	235:1,10 239:9	<b>141</b> 3:5	71:8,9,10,14
154:14 156:19	238:16 252:10	<b>1,800</b> 35:5,9	<b>1434</b> 306:22	71:20 72:23
166:15 174:18	266:1 290:25	<b>10</b> 3:12 6:19	<b>15</b> 7:3 79:14	77:20,21,24,25
180:11 183:9	<b>yellow</b> 97:25	154:10 234:23	237:17,18	89:13,17 92:14
186:23 187:4	<b>Yenni</b> 10:1,6,7	235:1,10	<b>15th</b> 46:5 49:8	93:19 96:9,14
187:22 191:20	10:15	<b>10:45</b> 282:13	<b>1530</b> 182:4	99:5 123:14
191:24 198:21	<b>yesterday</b> 13:17	<b>100</b> 110:17	<b>16</b> 3:3 188:3,13	129:8 137:11
216:23 231:8	13:19 16:20	172:23,25	189:6	158:2 160:10
231:21 232:9	17:5 88:13	240:8	<b>16TH</b> 307:3	162:18 163:9
232:24 239:9	125:23 188:1	<b>10013</b> 79:18	<b>1615</b> 1:19 2:8	165:6 168:23
253:3 254:15	188:10 194:12	<b>1013</b> 85:21	<b>17</b> 29:1,3 30:25	169:2 216:20
270:20 275:10	194:25 256:24	<b>1014</b> 83:24	31:1 237:18	222:10,11
278:25 279:6	268:14,16	253:21 274:10	<b>18</b> 186:25 188:3	239:10 245:1
293:5,13	270:9 293:9	<b>1016</b> 188:25	188:14 189:6	249:21 271:24
294:23	<b>young</b> 231:17	192:5 194:20	<b>180</b> 3:6	272:15,23
<b>year</b> 6:10,11	<b>y'all</b> 33:15	196:5	<b>187</b> 3:7,8	286:20 294:22
20:10 22:19	<b>Y-E-N-N-I</b> 10:8	<b>1018</b> 14:6 189:1	<b>19</b> 59:5 237:18	<b>2012</b> 45:21 46:5
23:1 27:7		192:6 194:20	<b>19th</b> 232:8	46:9 47:12
29:20 30:6	<b>Z</b>	<b>106</b> 213:2,4,9	<b>1969</b> 20:12	48:16,16 49:17
45:10,20 48:12	<b>Zatorski</b> 31:6	215:17 220:6	<b>1973</b> 22:14	50:9 55:15,17
63:8,12,21	<b>zero</b> 286:22	<b>11</b> 3:13 236:8	<b>1979</b> 25:19	64:4 70:22,25
64:14 71:1	<b>zeros</b> 246:9	237:17 241:21	<b>1984</b> 199:19	93:20 96:10,14
76:12 78:6	<b>zoned</b> 99:20	241:24 244:18	<b>1990</b> 30:7	99:5 128:2
85:10 101:6,17	<b>Z-H-A-O</b> 80:12	304:10	<b>1996</b> 28:24	130:18 131:10
103:11 104:1	<b>0</b>	<b>11712</b> 24:15	31:24 39:5	131:16 132:5
129:24 130:15	<b>001</b> 53:6,22	<b>12</b> 3:14 246:1,4	44:5	132:18,22
130:16 131:16	<b>003</b> 53:7,15	247:18 249:6	<b>2</b>	133:8,15
132:18 162:13	<b>004</b> 53:7	<b>12th</b> 78:16 79:5	<b>2</b> 3:4 79:13,20	134:13 141:7
178:5 231:7	<b>005</b> 53:7,15	237:17	213:2	172:6 175:7,10
238:15 242:6	<b>05</b> 44:20	<b>13</b> 3:15 111:17	<b>20</b> 28:25 140:15	181:19 183:5
287:5	<b>06</b> 44:19,20 45:3	247:23 248:1	239:19,22	184:22 205:21
<b>years</b> 5:24 7:2,3	<b>07</b> 45:3,4,12,24	249:6 257:20	240:15,20	206:5 207:23
19:4 22:9,10	162:15 206:6	257:22 260:6	<b>20th</b> 232:1	210:22 211:6
25:5 29:1,3	<b>09</b> 6:19	260:16 282:5	<b>2000</b> 44:3	212:13 218:20
30:25 31:1,20	<b>1</b>	<b>13th</b> 25:17,19	<b>2004</b> 5:14	221:19 235:18
34:5 39:14	<b>1</b>	26:15	<b>2007</b> 46:8 181:6	235:20 236:7,8
43:7 49:23	<b>1</b> 3:3 16:7,10	<b>1300</b> 1:19 2:8	<b>2008</b> 46:12	237:3,3,17,17
57:13 62:8	117:12 127:12	<b>13628</b> 5:10	<b>2009</b> 6:17,21,22	238:14 246:14
131:12 164:10	210:22 211:6	<b>14</b> 3:16 102:4	129:8	248:10,11
179:15,16	211:20 212:13	105:12 248:20	<b>2010</b> 6:11	<b>2013</b> 1:22 46:7
183:7 283:17	218:19 220:20	248:25 249:2,6	<b>2011</b> 19:2 70:23	55:20 60:25



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

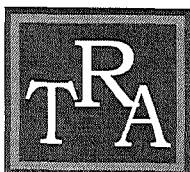
tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE

73:21 74:10,17 75:12 81:14 84:7 90:13 92:9 100:5,10 101:5,16 103:12,20 108:21 123:15 130:14,17 131:15 174:4 178:6 193:18 193:25 196:17 197:21 207:25 216:20 231:9 238:9 239:14 240:24 247:2 248:22 253:24 272:15,24 307:3 <b>204</b> 3:9 <b>209</b> 3:10 <b>21</b> 71:9,14,19 271:23 272:14 272:23 <b>22</b> 164:6 <b>22nd</b> 274:18 <b>23</b> 235:1,11 239:9 <b>230</b> 3:11 <b>233</b> 3:12 <b>24</b> 38:9,10 135:17 236:7 248:18,23 <b>24-hour</b> 51:14 <b>24/7</b> 54:23,24 181:9 <b>240</b> 3:13 <b>245</b> 3:14 <b>247</b> 3:15 <b>248</b> 3:16 <b>25</b> 205:21 <b>25th</b> 224:10	<b>2561</b> 2:5 <b>26</b> 1:22 25:5 <b>267</b> 247:19 <b>27</b> 25:5 126:4,13 127:5 183:5 184:22 224:23 272:15 <b>27th</b> 181:19 183:1 227:7,10 227:13 251:16 252:21,22 253:1 254:19 257:1,17 258:24 259:12 259:18 260:1 260:19,22 265:11,17 266:18 272:24 274:19,20 280:1 281:14 281:15 282:1 283:7,10,14 285:2 <b>271</b> 127:17 247:21,23 <b>273</b> 247:23 <b>28</b> 126:4,13,15 127:5 <b>28th</b> 252:2 253:14 254:22 257:21 281:15 283:21 <b>295</b> 2:18 <b>298</b> 2:22	<b>300</b> 129:22 208:5 <b>300(A)</b> 129:22 <b>304</b> 306:9 <b>305</b> 2:24 <b>31</b> 125:22 127:5 <b>31st</b> 126:4,7,19 <b>314</b> 246:9 247:24 <b>34-and-a-half</b> 5:25 <b>345</b> 231:5 <b>35</b> 5:24 <b>367</b> 247:15 <b>37:2554</b> 306:8	<b>68</b> 304:11,12,15 304:18 <b>69</b> 205:20	<b>9/27/13</b> 15:7 <b>9:20</b> 282:13 <b>9:58</b> 1:22 <b>90s</b> 32:12,13 59:13 <b>94</b> 29:22,23,24 <b>95</b> 29:23,24 <b>96</b> 32:2 33:19 39:12 41:9 <b>963</b> 210:22 <b>964</b> 210:22 <b>966</b> 205:19 <b>969</b> 220:19,21
		<b>4</b> 4 3:6 181:15,18 <b>4th</b> 231:22 235:19 236:1,2 <b>42</b> 5:17 <b>44499</b> 5:17	<b>7</b> 7 3:9 205:16,19 205:20 210:21 220:24 <b>7th</b> 235:19,19 236:2 <b>70012</b> 1:20 <b>70112</b> 2:9 <b>70808</b> 2:5 <b>73</b> 21:7 <b>74</b> 23:6 <b>75</b> 19:25 22:15 <b>750-161</b> 2:5 <b>77</b> 23:19 24:24 <b>78</b> 3:4 <b>79</b> 24:24,25 59:6	
		<b>5</b> 5 2:17 3:7 188:13,16,20 203:16 204:13 <b>5th</b> 231:8 235:18 235:19 236:2 <b>5:10</b> 305:13 <b>5:30</b> 182:6 <b>58</b> 6:7	<b>8</b> 8 3:10 100:10 210:18,21 253:24 <b>8th</b> 254:14,15 274:8,25 281:13 282:1 283:15 <b>80,000</b> 142:12 <b>83</b> 187:2,13,14 188:4,13,20 192:14,15 194:19 195:23 196:11	
	<b>3</b> 3 3:5 142:21,25 144:24,24 145:6 146:4 154:12 301:1 <b>3:12CV219</b> 1:5 <b>3:30</b> 182:5,6,7	<b>6</b> 6 3:8 188:14,16 189:23 190:1 203:16 204:13 250:11 <b>6.1</b> 142:4 <b>65</b> 156:14,15 248:19 303:14 303:21,22	<b>9</b> 9 3:11 231:3,6 236:3 237:2 <b>9-1-1</b> 256:21 257:4 <b>9/11</b> 44:9	



**TORRES REPORTING & ASSOCIATES, INC.**

COURT REPORTING & LITIGATION SERVICES

tra@torresreporting.com  
www.torresreporting.com

Baton Rouge, LA  
225.751.0732  
225.752.7308 FAX

New Orleans, LA  
504.392.4791  
504.392.4852 FAX

1.866.982.6878 TOLL FREE